

Local Plan Partial Update

Launch Consultation (April 2020) – Comments received

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A K & P J Sanders	Chew Stoke Parish Council	Danny Groves
Abbey Residents Association	Chew Valley Neighbourhood Plan Steering Group	David Charlton
Aberdeen Standard Investments	Chew Valley Plants Trees	David Graham
Alan Taylor	Chris Beezley	David Martin
Aldi Stores Limited	Chris Wilmot	David Milliner
Alexander Morgan	Chris Wilmot	David Morrison
Amy Langley	Christine Ware	David Morrison 01
Ancient Tree Forum	Christopher Harwood	David Morrison 02
Andrea Robinson	Circus Area Residents Association	David Morrison 03
Andrew Jones	Claire Hicks	David Redgewell
Andrew Keith	Claire Wilmot	Deeley Freed Estates & Legal and General Build to Rent
Andrew Mercer	Clare Goodhart	Des Wighton
Andrew Mercer 01	Clare Griffin-Felton	Dr. Christopher Lewis-Smith
Andrew Mercer 02	Clive Honeychurch	Duchy of Cornwall
Anna Knollys	Clive Rogers	Dunkerton & Tunley Parish Council
Anne Winpenny	Cllr Born	Council
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BANES Rural Transport Group	Cllr Hounsell	East Harptree Environment Group
Barbara Padfield	Cllr Matthew Shearn - Radstock Town Council	East Harptree Parish Council
Barratt Homes, Lays Farm, Keynsham	Cllr Rigby	East Harptree Parish Council Climate and Nature Emergency Working Group
Barwood Development Securities Ltd	Cllr Rob Langley	Edward Ware Sites
Bath and District RSPB Local Group	Cllr Singleton	Eleanor Ellington
Bath and North East Somerset Allotments Association	Cllr Stephenson-McGall	Emma Jukes
Bath and Surrounds Starlit Skies Alliance	Cllr Stephenson-McGall	Emma Shaw
Bath Chamber of Commerce and the Initiative in B&NES	Cllr Warren	Energy Efficient Widcombe
Bath Preservation Trust	Coal Authority	Englishcombe Parish Council
Bath Spa University	Colino Violante	Englishcombe Parish Council
Bathampton Meadows Alliance	Combe Hay Parish Council	Eric Lucas
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Beverley Cruse	Compton Martin Parish Council	Farrell & Co
Beverley Powell	Cotswolds Conservation Board	Farrell and Co
Beyond Dyslexia	Country Estates	Farrell and Co
Bradley Felton	CPRE Avonside	Fiona Etheridge
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Canal & River Trust	Crest Nicholson Strategic Projects	Friends of the Rec 01
Caroline Neath	Curo	Friends of the Rec 02
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Mendip Hills AONB
Messrs Pera
Michael Cooke
Michael Norris
Michelle Taylor
MNRE - Welton Bag, MSN
Mr & Mrs Vranck
Mr and Mrs Charles Carr and Wessex Water
Mr and Mrs Hinds
Mrs C Billingham
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Sophie Flook
South Stoke Parish Council
Sport England
St William Homes LLP
Stadium for Bath
Standard Life Assurance Limited
Stephen Hyde
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The Abbey Residents Association (TARA)
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Woodland Grove Community Group
Woodland Trust
Writhlington Action Group

Respondent A K & P J Sanders

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

With the current pandemic affecting everyone it is vital that in order to sustain our very existence we continue to maintain and nurture productive farmland with the utmost care and consideration. Brownfield sites are available in this area and must be utilised before green open spaces are sacrificed. The cost of decontaminating these sites is not a valid excuse!

This current proposal is wrong on every level: the loss of productive farmland, increased congestion, increased pollution, swamping a village community that has already accommodated 60 new houses in the last 3 years.

We trust you will consider our comments are valid in ensuring this proposal is declined.

Yours sincerely

A K & P J Sanders

Sent from my iPad

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Respondent Abbey Residents Association

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I would like to confirm on behalf of the Abbey Residents Association (TARA) that, while we have no comment on the current Commencement Document Consultation stage, we would like to be kept in touch with future stages and consultation opportunities.

Michael Brett
The Abbey Residents Association, Bath.
12.05.2020

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Respondent Aberdeen Standard Investments

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

On behalf of Aberdeen Standard Investments, please find attached representations to the Local Plan Partial Review consultation.

I would be grateful if you could acknowledge receipt and if you need any further information please contact me on the details below.

Kind regards

Matt

Matt Golisti

Senior Planner

Core PDR

Attachment included with response. Please contact to request to view

Respondent Alan Taylor

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I am writing to register my objection to the proposed local plan relating to RAD25 and RAD 26.

Both are Greenfield sites and RAD26 is a productive arable and grazing field.

Any proposed housing development would have a huge impact on the road system and adding a significant increase of traffic to the local area. Writhlington has a 5 way junction and the increase of traffic would put the children of the 3 local schools and other pedestrians at significant risk. The A362 to Frome is already a busy road with hidden dips and access from any development onto this road would significantly increase the risk of further accidents.

Any development in either sites would also use the two single-track lanes that leads to Peasedown St John and Bath. These lead to a 3t weight restriction over a narrow bridge and a blind 90° bend under the railway arch. This lane is often used as a short cut to Bath can be icy during the winter months and prone to extreme water run-off causing accidents.

Now that the Government, BANES and the Radstock Council have declared a Climate Emergency any housing development must not result in out commuting ,which would inevitably happen in this case,adding to more congestion and pollution to the local area. There is no local employment so any development would significantly increase the volume of traffic, congestion and pollution.

Writhlington has poor public transport and one small shop serving the area. The doctor and dentist surgery are already overstretched and are 1 mile away down a long steep hill.

The past 3 years there have been 60 new houses built adding to the pressure on the infrastructure and localised flooding to the road.Any further developments will have water run off even with sustainable drainage.

There are brownfield sites in the Somer V.alley that should be developed before any Greenfield sites are considered.

Writhlington has a rich history, with the Momouth Stone close to RAD25, local wildlife including fruit bats and slow worms RAD 26 and these need to be preserved for future generations.

Yours sincerely,
Alan Taylor

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Respondent Aldi Stores Limited

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir or Madam,

Bath and North East Somerset Local Plan Partial Review

Representations on behalf of Aldi Stores Limited

I write in respect of the public consultation process for the BANES Local Plan Partial Update.

On behalf of my client, Aldi Stores Limited, please find attached representations on the draft documents. I would be grateful if these could be taken into consideration in the plan making process.

If you could also add me to a consultation database keeping me up to date with the process that would be appreciated.

Kind regards,

Phil

Attachment included with response. Please contact to request to view

Respondent Alexander Morgan

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I live in Green Parlour and strongly believe that this plan should not be accepted. Below is a list of reasons why this proposal should be refused.

The roads are already very busy especially at school times, more traffic in the area would cause more congestion, pollution and danger both for pedestrians and other road users. I urge a representative to come to Manor Road junction to see how dangerous it is for both cars and pedestrians particularly at peak times before and after school. The lives of over 1500 children are at risk already on these roads.

I am particularly concerned about the effect that the increased traffic would have on the single track lanes in the area such as Old Road, The Combe, Braysdown Lane, Church Hill and Green Parlour Lane. These are all rural roads that are not well maintained. Accidents regularly occur on these roads and this would only worsen if the developments were to take place. These are especially dangerous during icy conditions as they are never gritted.

The area is a greenfield site inhabited by various species of wildlife and is productively farmed. There is absolutely no need to develop on this site as there are brownfield sites still available in the Somer Valley area.

Currently there are over 200 houses under £300,000 for sale. There are a number of new houses which have been for sale for over 6 months that have not sold. This shows that there is no demand for new build properties in the area. Writhlington has already undergone new developments in the past 2 years which means that it has already reached its quota.

In terms of drainage, this site is prone to groundwater cascades after heavy rainfall especially along Church Hill and Green Parlour Lane. This makes the roads dangerous and causes erosion. Even with sustainable drainage, the site would still see significant water run off with this development.

I will be undertaking a survey of the traffic count in the area to prove that the roads are already heavily used and would not be suitable for further traffic.

I urge you to take these points into consideration and please object to the plans.

Regards,

Alexander Morgan

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Respondent Amy Langley

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Again I'm sending my objection against the plans for building houses (Rad 25 and 26) on greenfield sites. It was only last year that us a community signed a petition against it, more than 300, this shows that majority of the village don't want the houses here. The land suggested is farmed which needs to be preserved , we also have allotments adjacent to the field which would be hard to use. Considering we are in lockdown at the moment the open space had been well used and very much needed.

I have lived here for 39 years and choose to stay here to bring up my family in a village which I love and of which doesn't want to see developed on as stated.

Also concerning is the amount of wildlife we have around here which would almost certainly disappear.

Amy Langley

Sent from my iPhone

Respondent Ancient Tree Forum

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Consultation response form the Ancient Tree Forum on the list of policies subject to review.

Bath and North East Somerset Local Plan

Dear Sir/Madam

On behalf of the Ancient Tree Forum, I would like to request that Policy PNP:NE6 Trees and Woodlands Conservation is also included for review. (This policy is currently not included in your list of policies proposed for review) This may include a minor change of wording to include "veteran trees" but it is a critical change to national policy included in the revised NPPF July 2018 S.175c and the revised Planning Practice Guidance updated July 2018 "Ancient woodland, ancient trees and veteran trees: protecting them from development" and has a significant effect on development proposals.

The Ancient Tree Forum (ATF) is a charity which has pioneered the conservation of ancient and veteran trees and is the main UK organisation concerned solely with their conservation. The ATF seeks to secure the long-term future of ancient trees through advocacy of no further avoidable loss, good management, the development of a succession of future ancient trees, and seeking to raise awareness and understanding of their value and importance. The ATF has been involved in consultations and contributions to the NPPF 2018 working alongside partners The Woodland Trust and Natural England.

Tim Kellett

Chair Cornwall Ancient Tree Forum

SW Lead Verifier for the Ancient Tree Inventory

Respondent Andrea Robinson

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have the following policy suggestions for adoption into the Local Plan Partial Update: 1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set based on research specific to Bath to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In

order to stem the loss of industrial space (especially to PBSA uses) and to provide opportunities for small and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?
No.

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Respondent Andrew Jones

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Policy CP5 - Flood Risk Management. When developers carry out a Flood Risk Assessment they typically only check against the Environment Agency flood risk from Rivers and Seas (i.e. flat area flooding). For communities on steep slopes, such as the Mendips, they will typically have the lowest risk from Rivers and Seas but are particularly susceptible to Surface Water flash flooding. Please update this policy to also require the Flood Risk Assessment check to be done against the EA flood risk from Surface Water in the nearby vicinity as well, such that if either check shows an increased level of risk then this policy would escalate the requirements.

What are your views on the new Draft Statement of Community Involvement?

Figure 2 on page 7 of the SCI makes it clear that public site notices for local planning applications are not always displayed. I believe the general public have an expectation that such notices would always be displayed to alert them to local planning ap

Respondent Andrew Keith

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I support the review of the Policy areas listed, especially: CS:CP1 Retrofitting Existing Buildings PMP:H1 Housing and Facilities for the Elderly, people with other Supported Housing or Care Needs PMP:H7 Housing accessibility The retro-fitting Policy section must address accessibility as well as climate change. We have an ageing population generally and the old Bath houses on multiple levels are not accessible. Features such as stone staircases have specific conservation issues with fitting stairlifts due to the need for drilling the steps. The addition of lifts internally or externally will cause less harm to heritage assets. If this is ignored, the housing stock will become unbalanced with the population; older houses will become unattractive to residents and will be under-maintained. External lift shafts should be preferred, since internal lift shafts carry a risk of fire spreading between floors. External lift shafts, within guidelines, must be permitted development.

Do you have any other specific observations to make on the Local Plan Partial Update?

CS:CP1 Retrofitting Existing Buildings Bath must be an enjoyable place to live. In order to preserve the high number of listed buildings in Bath, it is imperative to allow them to be adapted to be attractive buildings to live in. This approach

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Respondent Andrew Mercer

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

YES

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

YES

Do you have any other specific observations to make on the Local Plan Partial Update?

YES

What are your views on the new Draft Statement of Community Involvement?

NO

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Andrew Mercer 01

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Hi

Please could you accept these documents as a preplacement to my previous submission. I was not able to attach the appendix documents.

Thank You

Andrew Mercer

Attachment included with response. Please contact to request to view

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Launch Consultation (April 2020) – Comments

Respondent Anna Knollys

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

We support the Council's focus on the climate emergency and it being a priority in all decision making.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

We support the Council's focus on the climate emergency and it being a priority in all decision making.

Do you have any other specific observations to make on the Local Plan Partial Update?

We support the Council's focus on the climate emergency and it being a priority in all decision making.

What are your views on the new Draft Statement of Community Involvement?

We support the Council's focus on the climate emergency and it being a priority in all decision making.

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Respondent Anne Winpenny

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

yes

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent BANES Rural Transport Group

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I attach a response to the consultation on the Local Plan Partial Update and Draft Statement of Community Involvement as emailed out from Planning Policy on 6 Apr 2020 at 13:56.

The response is from and on behalf of the BANES Rural Transport Group (BRTG). The Group is a joint initiative between BANES and its rural parishes. It was created in June 2019 as agreed at the Parishes' Liaison Meeting in March 2019.

I would be happy to provide further detail as required.

Regards

David Orme

BRTG Programme Manager/Secretary

Attachment included with response. Please contact to request to view

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Respondent Barbara Padfield

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear sir/madam I wish to voice my concerns re the proposed developments in Writhlington. I have grave concerns re any future developments mainly from a health and safety point of view. The high volume of cars at the moment endanger schoolchildren and pedestrians. This will obviously increase if more houses are built because there is no regular public transport available for commuters to get to their jobs. The sites are green fields and supports a diverse range of wildlife that once lost will be gone for ever. Our area has had over 60 new houses and no further loss of arable land should be allowed. We have one small corner shop, no post office or doctors surgery and the schools must be nearly full to capacity. Accidents occur locally on a almost weekly basis due to the volume of traffic already without further building.

Yours sincerely Barbara and Philip Padfield.

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Respondent Barratt Homes, Lays Farm, Keynsham

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

Please see our representations, prepared on behalf of Barratt Homes (Bristol) in respect of their interest at 'Lays Farm, Keynsham'.

I trust the attached is of use and I would appreciate if you could confirm receipt of this email at your earliest convenience.

If you have any questions, please do not hesitate to get in touch.

Kind regards,

Daniel Millward

Senior Planner

Pegasus Group

Attachment included with response. Please contact to request to view

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Respondent Barwood Development Securities Ltd

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Hello,

Please find attached our submission to the Local Plan consultation on behalf of Barwood Development Securities Ltd.

If you have any queries, please do not hesitate to contact me,

Thanks
Felicity

Attachment included with response. Please contact to request to view

Respondent Bath and District RSPB Local Group

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

The proposed B&NES Local Plan Partial Update provides a timely opportunity to incorporate forthcoming biodiversity enhancement requirements on local authorities contained in the proposed Environment Bill 2020, and to include policies and processes relevant to the B&NES declaration of a climate and nature emergency.

I represent the RSPB Bath Local Group, and Bath Swift Group, which is part of the national Swift Local Network (SLN). The SLN has recently developed suggested clauses to be included into a Local Plan, which I have attached.

The swift is a Bathscape iconic species and the content of the clauses attached would be appropriate to include in PMP:NE3 and PMP:NE4c and 4d(i andii) as the swift only nests in buildings. It could also be referenced in PMP:D5 Building Design or incorporated in a new B&NES Supplementary Planning Document (SPD) along the lines of Exeter City Council's Residential Design Guide (<https://exeter.gov.uk/planning-services/planning-policy/supplementary-planning-documents/residential-design-guide-spd/>).

Regards

David Robertson
Group Leader, Bath and District RSPB Local Group and Bath Swift Group

Attachment included with response. Please contact to request to view

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Respondent Bath and North East Somerset Allotments Association

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

YES - see attached document

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

NO

Do you have any other specific observations to make on the Local Plan Partial Update?

This Update should now take into account the impact of the Covid 19 pandemic.

What are your views on the new Draft Statement of Community Involvement?

No

Attachment included with response. Please contact to request to view

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Respondent Bath and Surrounds Starlit Skies Alliance

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Yes. PMP:D.8: Lighting Needs to be updated to reflect: -1 There is growing evidence of the damaging effects on both wildlife and humans of excessive and unnecessarily blue lighting. This is a health and safety issue for humans, and a threat to the eating, breeding, and migrating success of birds and insects. It should be addressed now. - 2 The contribution that lighting improvements can make to energy savings as part of the climate change response.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

No

What are your views on the new Draft Statement of Community Involvement?

No

Respondent Bath Chamber of Commerce and the Initiative in B&NES

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Our members are very pleased there is a recognition of a shortfall in housing supply. It is crucially important for the local economy that there are adequate numbers of homes , particularly those that are generally affordable. There will doubtless be strong opposition to some proposed development sites but it is to be hoped that elected members hold their nerve and show the necessary leadership and courage which will produce the housing we need.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Bath Preservation Trust

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please find a consultation response from BPT attached.

Kind regards

Joanna

JOANNA ROBINSON

SENIOR PLANNING & CONSERVATION OFFICER

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Bath Spa University

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam

On behalf of our client, Bath Spa University, please see attached our representations to the B&NES Local Plan review document.

We would be happy to discuss these representations as required.

Kind regards

Sophie

Sophie Stocker | Senior Planner
CBRE Ltd | UK Development - Planning

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Bathampton Meadows Alliance

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

The BMA's Consultation Response and its Appendix are attached to this message.

I should be grateful for confirmation of its receipt.

Terry Wagstaff

Attachment included with response. Please contact to request to view

Respondent Ben Pope

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have the following policy suggestions for adoption into the Local Plan Partial Update: 1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space

(especially to PBSA uses) and to provide opportunities for small and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Berenice Diver

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please update the section on allowance of HMOs and PBSAs. I live in Oldfield Park which is over-run with student accommodation and yet still we have to regularly object to planning proposals against further student accommodation in the vicinity. This area has already been highlighted that it is well over saturated with student accommodation, but still the planning applications for further come in. Please make a blanket NO to any further HMOs and PBSAs in this area to try and get some balance for families and the community in the future. Please also update the policies that a current HMO cannot increase the number of rooms/tenants it lets to. There have been a number of houses nearby which are registered HMOs but have just been allowed to add in extra rooms by cutting up the house or adding extensions. These in no way add to the community and permanent residents, but merely further line the pockets of the landlords.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No further expansion of current HMOs/PBSAs and no further new ones allowed - see previous section.

Respondent Beverley Cruse

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I live in Green Parlour and am writing to you to object to development of RAD 25 RAD 26. Please see below some reasons for this:

I would like to emphasise the fact that I was almost hit by a van whilst walking between the cycle path and my home along The Combe which left me very shaken up. If the planned works were to take place, many more people would be using this road both in vehicles and by foot. The entire area surrounding the site is already unsafe for both drivers and pedestrians.

A school child was sadly knocked over by a vehicle as they were on their way to school. I strongly advise that a representative visits the area during peak times before and after school to see the mayhem for themselves after lock down has ceased.

As a driver, I have witnessed firsthand the dangerous conduct of those who are not used to driving along roads such as Old Road. Due to the poor visibility and narrowness of the roads, those who are not used to driving in the countryside tend to drive too quickly which is dangerous for both pedestrians and vehicle users. With new housing in the area, more drivers would be on the road making this even more dangerous. Additionally, there are many horse riders who access the fields via Old Road and the surrounding lanes, they would be even more vulnerable with more traffic on these roads.

In terms of the quality of the roads that already surround the site, they are constantly in need of repair and are poorly maintained. With more cars using these lanes, they would fall further into disrepair. This is a hazard not only for drivers but also for pedestrians.

The crossroad is already dangerous with poor visibility and with cars travelling very fast along it coming down from Terry Hill crossroads. This road has experienced several accidents in recent years which would only get worse if more cars were on the road.

I think that the fact that this is a greenfield site is a fundamental reason why the plans should NOT go ahead. The area is home to wildlife and is used for productive farming and as such, the site should not be used when there are brownfield sites in the Somer Valley area that could be used instead. Additionally, Writhlington has already reached its quota for residential development in the past 2 years and so further development is not required.

I urge you to please take these points into consideration and make the decision to reject the plans.

Yours sincerely,
Beverley Cruse

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Beverley Powell

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

No more HMO's or PBSA.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No more HMO's or PBSA.

Do you have any other specific observations to make on the Local Plan Partial Update?

No more HMO's or PBSA.

What are your views on the new Draft Statement of Community Involvement?

No more HMO's or PBSA.

Respondent Beyond Dyslexia

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

The plan particularly focuses on economics and transport links. The recent Covid-19 pandemic highlights that more and more people are working from home and the digital economy doesn't need the same level of physical transportation. What has happened in more rural areas with vastly improved broadband/internet communications. This plan needs to give these rural communities more support and offer more community support and allow careful incremental additional housing. Such housing can easily be absorbed and add to community spirit even economies of scale. This plan doesn't anticipate the monumental increase in demand from bigger communities such as London as people realise they don't need to be in a big city to do their job. So many problems will result if this migration to the Bath and the south west isn't addressed in this plan. This plan misses the point badly by not allowing incremental housing and afford those communities support to thrive with new small scale housing - even infill housing.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

Again this plan is not sufficiently creative in addressing the digital economy. Communities such as Wellow have thrived with the community itself taking control of its own facilities where the council has completely failed. Wellow for instance has itsel

Do you have any other specific observations to make on the Local Plan Partial Update?

In Wellow we have around 55 residents, a primary school for 1 pupils, a pub, shop and fabulous sports facilities. It's village hall was built in the 195's and is inadequate. The village could comfortably take 3 more houses with say 1 more people and the

What are your views on the new Draft Statement of Community Involvement?

Until I happen to come across this new strategic plan I wasn't even aware of it. I'm pretty sure that the people that have made things happen in the community have not been connected. I personally raised £5k in the last 5 years for the community and hav

Attachment included with response. Please contact to request to view

Respondent Bradley Felton

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

To Whom it may concern,

I strongly object to the inclusion of RAD26 and RAD25 as possible areas for housing development in BANES Local Plan

RAD26

* The land is a Greenfield site, which has been used to productively grow arable crops for at least the last 200 years. It is valuable farmland that produces local food. The Government advises councils to avoid building on agricultural land. There are several Brownfield sites in our area, which should be developed as a priority. Writhlington has already exceeded the quota for new houses with more than 60 built in the last two years.

* RAD26 offers provides open space, strengthens existing landscape features and views to the open landscape. This field is also a vital habitat for a number of species as recorded by local residents. Writhlington is an area rich in history, flora and fauna; this historic and natural environment needs to be preserved for future generations.

* The infrastructure will not support such a development with local services such as the doctor and dentist already stretched beyond capacity. Public transport is very poor, and due to the very hilly nature of the area it's inappropriate to suggest people could walk or cycle to work, shop or access local services. A development here would be car dependent as there are few opportunities for work in Writhlington meaning that people would be forced to use their cars.

* The road system will not be able to sustain further pressure generated by another housing development.

The A362 is already a busy road with hidden dips, access to/from a new development and the increased traffic would add significantly to safety concerns. The 5-way junction of Frome Road/Knobsbury Lane/Manor Road/Old Road is dangerously congested and frequently gridlocked, particular at peak times and is extremely hazardous for drivers and pedestrians at peak times and regular traffic collisions occur, despite the newly installed speed camera and the pelican crossing. The safety of the students from the 3 schools, who are forced to navigate it, is already compromised. Additional traffic, generated by another housing development, will only exacerbate the problem. The recent development, Orchid Way, has already added further to congestion here. The rejection of an application by BANES to build 160 houses in Writhlington in

2019 stated that the development would have a 'severe and cumulative effect' on the road system in Radstock.

Some traffic from any development would inevitably use two single-track lanes, Green Parlour/The Coombe and Church Hill, which lead to Bath. These roads lead to a 1.8m wide bridge, with a 3-ton limit and a blind 90-degree bend underneath the railway arch. They are prone to extreme water run-off, and in winter are often dangerously icy, causing accidents. They are excessively used, making it dangerous for walkers, horse riders and cyclists and also provide the nearest access from Writhlington to the cycle way as cycling down the busy A362 without a designated cycle lane is not acceptable.

* The Government, BANES and Radstock Councils have all declared a Climate Emergency. Any housing development must not result in out commuting, with additional vehicles on our roads adding to congestion and pollution.

* There is very strong feeling amongst villagers in Writhlington against further development here. In 2019 over 230 objections were made to BANES protesting a planning application on RAD26.

RAD25

NB All of the above objections apply to RAD25 as well as the below

* The area identified as RAD25 is inaccurate as it includes a Grade 2 listed building, which is privately owned, and the owner has no intention to sell.

* RAD25 has been used for agricultural purposes for years and is used to rear free-range poultry and has beehives producing honey.

* A development of the site would be very visible from the valley and would be detrimental to the landscape and visual character of the area.

* Access to the site would open on to Church Hill or Manor Road. Drivers would undoubtedly turn right out on to Church Hill to take a short cut to the Peasedown bypass driving through the two Conservation areas in Lower Writhlington across the narrow bridge over the Wellow Brook and under the railway arch which is on a blind bend. This development would make safe access to this green space even more hazardous and is approximately 80 metres from the single-track part of Church Hill, which is extremely steep, mostly single track with blind corners. The road is dangerous as it's in poor condition, there's a spring that runs onto it as well as run off from the hills.

* This site supports a wide range of wildlife, such as bats, deer, slow worms, hedgehogs as well as a huge variety of birds, which would undoubtedly be adversely affected by this development.

* RAD25 and the immediate area surrounding and near it are rich in history with The Monmouth Stone, a Standing Stone registered by The South West heritage Trust on its boundary with Church Hill, an ancient Lime Kiln in an adjacent field as well as two Grade 2 listed buildings adjacent to it. There are further listed buildings in the Conservation Area at the bottom of Church Hill as well as the site of Writhlington Manor, which has links to George Washington. The Batch at the site of Lower Writhlington Colliery is well known for being a rich source of fossils.

Regards,

Bradley Felton

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Caddick Land

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

The Partial Update is a pragmatic response to the failure of the Joint Spatial Plan to be found to be sound at Examination, thereby creating an unfortunate vacuum in strategic planning policies to replace the adopted Core Strategy. Whilst it will be important to bring forward a sound replacement Strategic Plan, be that for BANES or be it another Joint Spatial Plan, it is important for BANES to review its Development Plan to ensure that its policies are consistent with Government policies and to ensure that policies for the supply of housing are updated to enable the Council to meet its current and future housing requirement needs. The Partial Review will be taking place at the same time the Government is proposing to publish a Planning White Paper and to review the calculation of Local Housing Need. Whilst the Partial Review refers to the need to review housing supply in order to ensure the Council can meet the housing requirement set out in the Core Strategy, given the delay in deciding how to review the Core Strategy, the Partial Review needs to ensure that its review of policies for the supply of housing sites will be sufficiently flexible to address any increase in the District's housing needs arising from the Government's Planning White Paper and review of the local housing need calculation. Whilst it will be for the review of the strategic policies contained within the Core Strategy to consider the future spatial distribution strategy, the Partial Review will need to be the subject of the Duty to Cooperate to consider any cross boundary implications and to prepare as required Statements of Common Ground.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

The programme is realistic though all efforts should be made to streamline the process without prejudicing the need to undertake full and proper consultation.

Do you have any other specific observations to make on the Local Plan Partial Update?

None

What are your views on the new Draft Statement of Community Involvement?

None

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Canal & River Trust

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Thank you for consulting the Canal & River Trust on the draft partial review, please find our comments attached as the Surveymonkey form has closed prematurely.

Kind regards

Jane Hennell MRTPI

Area Planner

Canal & River Trust

Attachment included with response. Please contact to request to view

Respondent Caroline Neath

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs

I write regarding the above sites located in Writhlington, currently labelled 'suitability not proven'. After the significant groundswell of local opinion, reflected in the objections to the Gladman proposal in 2018/19, I am astonished that the status has not been altered to 'unsuitability proven'. Writhlington has recently been subject to unsympathetic development such as Orchid Way. Not only does this add nothing to the local environment, but has served to increase local traffic at a junction already overloaded by traffic. Due to the fact that our small village has a Primary and Secondary School, there is a very significant number of pedestrians- staff, pupils and parents, together with associated traffic, both of which are considerable during busy periods. Added to the traffic to and from the leisure centre, the junction of Frome Road, Manor Road and Knobsbury Lane is a pinch point and presents significant potential danger to all road users.

During consultation over Orchid way, concerns were raised about traffic and flood risk, which were ignored. The consequences are very evident, with significant flooding this winter to the land to the south of Orchid Way. This land, within the Mendip boundary, remained under water for months, and a small river was created, flowing from the saturated land onto the Orchid way development. As there is no local employment, residents in Orchid Way travel by car to work, increasing the traffic flow to local roads already overwhelmed by the volume of traffic. Despite the flooding, this saturated land appears to be a site Mendip are considering for new development. This would add to the flooding issue, traffic issue and any Monies due to the local Authority to assist with local infrastructure would go to Mendip. Thus, Writhlington would derive no financial benefit but suffer all the negative consequences.

Writhlington is now facing a dual threat- on the one hand Mendip are keen to develop land on the BANES boundary as it is located on the extreme north of Mendip, and is therefore less contentious due to the fact that Mendip residents are less likely to object. It seems as though, despite objections from the local population and statutory bodies, BANES have kept the above 2 sites as a back-up plan, in the event that the quota cannot be satisfied elsewhere.

Since the Gladman proposal was rejected, BANES Highways Department has carried out inspections of Church Hill and The Combe, following up concerns about the use of these roads by HGVs. BANES had been unaware of the existence of the old and vulnerable bridge at the bottom of The Coombe and have now agreed to impose both weight and height restrictions on these routes as a result. We are currently awaiting signage to be installed. These 2 roads would be directly affected by any development on RAD25 and 26 and the imposition of further restrictions on them underlines their unsuitability for the increased flow of traffic arising from new development. It would not simply be the cars owned by new residents, but the vehicles of visitors, delivery vans and lorries (significant in this area), maintenance vehicles etc.

BANES own policies state that:

There is a need for

- increasing local food production-
- protecting and enhancing biodiversity
- Conservation and enhancement of the natural environment

RAD 26 is high quality agricultural land used to grow crops. It is home to bats, hedgehogs, slow worms, deer and a wide variety of birds such as owls, red kite and buzzards. It is not acceptable to suggest alternate habitat can be made available as evidence shows that in such cases the animals can die out due to a lack of care, even when protected by law.

BANES must adhere to its own policy regarding the Climate Crisis. New development must satisfy the requirement for it to be sustainable. Brownfield sites must be prioritised with housing located in areas where residents are not reliant on cars for transport, the risk of flooding is minimal and the local fauna and flora will not be destroyed. Habitat destruction is one of the biggest threats facing our world now. RAD 25 and 26 must be removed from the Local Plan.

Yours Faithfully

Caroline Neath

Respondent Caron Staley

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I am writing to object to the proposal for development of housing on the following land in Writhlington, Radstock:

- RAD25
- RAD26

These are greenfield sites being productively farmed and are outside the housing development boundary. There are brownfield sites in the area which should be developed before these are even considered.

The roads surrounding these sites are busy already, any increase in traffic on both narrow, local lanes and the 5-way junction on Frome Road will endanger locals and school children. Almost 1,500 children approach this junction on an average school day, along with members of the public accessing the sports centre, local shop and garage – all on or just off the junction. Two lanes leading to the sites from Peasedown and Bath are single track, have weight restrictions, are prone to water run-off which damages the road surface, and in winter are often dangerously icy. Accidents are frequent enough already, and additional traffic will only worsen the situation. Significant improvements to both the junction and lanes are already required at current levels of use to make them safe for existing users; as a local pedestrian, cyclist and driver I can attest to a number of personal near-misses, and am aware of numerous accidents which often close the lanes. With no concurrent plans to improve the local road network, adding more load is simply dangerous.

There are minimal employment opportunities in Writhlington, and as public transport links are poor, residents are mainly reliant on cars to travel to work, as well as access local shops and other services. Being sited on top of a hill means that cycling or walking to access services is not possible for a great number of people. I live in Writhlington, but work in Bath, and my hours of work coupled with childcare arrangements make it impossible for me to use public transport with any regularity. Having declared a Climate Emergency, this is exactly the kind of development B&NES should be discouraging as it will add to local congestion and pollution.

60 new houses have already been built in the village in the past 3 years, placing significant pressure on local infrastructure. The quota set by B&NES for this area to 2029 has been met by this previous development, and therefore no further development should take place. I request that RAD25 and RAD26 are removed from the B&NES plan as they are unsuitable for development on the above grounds.

I would appreciate confirmation that this comment has been received.

Yours
Caron Staley

Respondent Chew Stoke Parish Council

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

The scope of the Local Plan Partial Update, which states, “Together these documents (i.e the Core Strategy and the Placemaking Plan) form the Local Plan for B&NES”. We would respectfully point out that all made Neighbourhood Plans in the Authority’s area, including specifically the Chew Valley Neighbourhood Plan, are also integral parts of the Local Plan and suggest that the Policy team has failed to recognise this fact and take it properly into account. We would note that PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 1, A13 suggests consideration and consultation.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

The programme for the preparation of the Local Plan Partial Update takes no account of the interfaces with Neighbourhood Areas and the requirement for coordination with Neighbourhood Plans and relevant Steering Groups. While 6 Planning Policies will be

Do you have any other specific observations to make on the Local Plan Partial Update?

We would like the Partial Update to address a number of known planning policy issues, including: 1. While the CVNP was prepared based on the current Core Strategy and Placemaking Plan these were not ‘made’ until after the CVNP. This delay created an un

What are your views on the new Draft Statement of Community Involvement?

The section on Neighbourhood Planning is a re-statement of what the Authority is obliged to do in support of the development of new Neighbourhood Plans and as such is inappropriate. We suggest that the Draft Statement of Community Involvement should ad

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Chew Valley Neighbourhood Plan Steering Group

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs,

Please find enclosed a response to the current Consultation on the Partial Update to Local Plan from the Chew Valley Neighbourhood Plan Steering Group

We look forward to receiving your report on the consultation in due course.

Regards

Jon Mitchell
Chairman
Chew Valley Neighbourhood Plan Steering Group

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Chew Valley Plants Trees

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I am e-mailing you on behalf of 'Chew Valley Plants Trees'.
Please see the attachment.

Thanks
Chris Craig
Compton Martin

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Chris Beezley

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Yes. I am pleased to see that PMP Policies SB19, SB2 and B5 - relating to the universities - are ticked for review (pp.18, 19). Although PMP Policy H2 (p.1) on HMOs is also ticked for attention, I suggest that it should include the urgent review of the non-effectiveness of the HMO Supplementary Planning Document which has been demonstrated by FoBRA (and acknowledged by B&NES) to fall well-short in its stated intention of limiting HMOs to 1 per cent of households over much of the city.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

No

What are your views on the new Draft Statement of Community Involvement?

No

Respondent Chris Wilmot

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

As a resident of Oldfield Park which is an area dominated by student HMOs I will be commenting specifically on Paragraph 13 (f) of the Local Plan 2 which will be "looking at the impact of student accommodation within the city (both Purpose Built Student Accommodation and Houses of Multiple Occupation)".

1. Many of the streets in Oldfield Park have well over the allowed percentage of HMOs. Most have a staggering 3 or 4 times the specified number . This means that, given the number of students in each HMO (Usually 4 or 5 but sometimes 6 or even 7) compared to the number of permanent council tax-paying residents, up to 70% of adults in these streets during term time are students.

It is not that they are students per se , more that they are of a limited age range (19-24) and , importantly ,are temporary residents . Clearly this situation has a massive impact on social cohesion and community balance.

2. The introduction of Article 4 Direction in 2013 has had an impact in that it has prevented the conversion of 'family homes' to HMOs in those areas which have an excess of HMOs already. However some landlords are getting around this by extending their properties upwards and /or outwards so they can cram more students into the HMO , therefore increasing the income gained. If this became widespread the percentage of students in the relevant streets could rise to over 80%!! They would then represent a campus ,rather than a mixed community , even more than they do today. This practise must be stopped.

3. The number of Purpose Built Student Accommodation popping up around the city is, frankly, a slap in the face for all those people who desperately need decent affordable homes in the city.

If more of this type of accommodation is need then they should be built on Campus.

4. In order to encourage prospective (non-investor) buyers of current HMOs the Council could consider the introduction of a two year Council Tax 'Holiday' to enable the new owner to make the necessary changes to the property to revert it to a ' family home.' This would cost the Council nothing , because no Council Tax had been charged anyway , and, moreover , the council will know that , after two years it will start receiving that Tax.

5. The Council should urgently redress the balance of areas like Oldfield Park , whose communities have been overrun by student houses over the last twenty years or so. Article 4 Direction has helped to some extent in that there has not been an increase in HMOs . But an HMO is Simply a building and buildings don't in themselves make communities . PEOPLE DO. The council; purports to support 'BALANCED COMMUNITIES' . It has clearly failed with respect to Oldfield Park and other areas that have been victims of the over-expansion , and influence, of the two universities in this small city.

To sum up:

1. There should be a ban on Landlords extending their HMOs in order to increase the number of students in that property.

2. The Council should consider a total ban on new HMOs in any part of the city.

3. There should be no more Purpose Built Student Built Accommodation built in the city. If needed they should be built on campus.

4. A Council Tax Holiday for two years should be offered to prospective , non-investor, buyers of HMOs.

Chris Wilmot

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Chris Wilmot

Response Type: Online Form

Do you have any other specific observations to make on the Local Plan Partial Update?

There should be an immediate and total ban on all new student accommodation including new HMOs as well as purpose built student blocks.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Christine Ware

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs

Please find below my objections which lay out very succinctly why these possible developments should not proceed.

Yours faithfully
Christine Ware

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Christopher Harwood

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir or Madam,

It has come to my attention that Banes are in consultation regarding a partial update to the above plan. As the consultation closes on the 1st of June 2020 and you have only stated there is a need to update the "housing land supply".

I would like to ask if you could supply me with what the new partial update entails.

My reason for this is in relation to your local plan RAD 25 and RAD 26, which was refused by your committee, on

objections from BANES Archeology, BANES Highways, BANES Planning and BANES Landscape plus 234 other objections including myself.

I feel that nothing has changed since this application refusal and indeed since BANES has announced a climate emergency this is even more so not to consider any applications for development in the Writhlington area , as residents are in the main car dependent as the bus service is woeful.

Yours Faithfully

Christopher Harwood

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Circus Area Residents Association

Response Type: Online Form

What are your views on the new Draft Statement of Community Involvement?

Yes. I have a comment regarding Figure 3 on page 1 of the draft Statement of Community Involvement. Although this may seem a small point, I think that the list should be re-ordered such that 'Residents' comes top of the list. Residents represents ev

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Claire Hicks

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Local Plan Partial Update - Comments

I am submitting comments on the Local Plan Partial Update.

I understand there may be a need for changes to planning policies in response to the Climate and Nature Emergency Declaration, as well as other issues. Changes may take into account safe walking routes and a provision of sustainable cycling infrastructure, as well as having housing land to meet Core Strategy requirement.

However I am writing to object to the inclusion of Rad 25 and Rad 26 (Writhlington) on the Local Plan currently under review.

These sites are unsuitable for housing for a number of reasons, including very poor road access and infrastructure. Green Parlour, The Coomb and Church Hill are narrow lanes leading from these agricultural fields already over used as a route to Peasedown and Bath. The 3-ton road limit, 90 degree bend and 1.8m narrow bridge makes these routes unsuitable for any increase in traffic. The 5 way junction on the A362 is also a busy route with holdups and jams especially during school opening and closing times. Neither route leads to safe cycling tracks.

Local services, doctors, dentists and the like are unable to sustain the growth of population in this area which has already seen significant growth in the Radstock Town.

Having plan led solutions to ensure housing is delivered in the most sustainable locations with necessary supporting infrastructure is admirable, and sites fulfilling this criteria would be more welcome.

Thank you.

Claire Hicks

Respondent Claire Wilmot

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Having personally being affected by an HMO next door to me having had his licence just increased to house 7 students in what was a small 3 bedroom family terraced house in Oldfield Park , and as a result of discussions with other residents in Oldfield Park I feel very strongly about the following policy suggestions for adoption into the Local Plan Partial Update: 1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development , it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 1. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must to be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student

studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space (especially to PBSA uses) and to provide opportunities for small and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Respondent Clare Goodhart

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Council Officers

LOCAL PLAN PARTIAL UPDATE

Further to the B&NES Council partial update of the Local Plan, I would like to make the following comments before the consultation closes:

* The Local Plan Partial Update Document says that the scope of the Partial Update is confined to those areas that can be addressed without changing the spatial priorities of the Core Strategy and Placemaking Plan; the spatial strategy and the strategic housing and job growth requirements (Page 8 paragraph 8). The scope of the Partial Plan does include 'replenishing the supply of housing through the identification and allocation of new sites' (Page 9 paragraph 13). I note that preparation of the Local Plan Partial Update will be informed by a range of evidence ... 'further evidence base work is likely to include the following: Local Green Belt assessment'. (Page 12 paragraph 16). I would like to make the points below about retaining the current Green Belt designated areas:

* 1. Green Belt land often includes significant local biodiversity and captures carbon as well as providing space for agriculture or water to prevent flooding. It protects the attractive landscapes so important to our environment, heritage and wellbeing. There is a body of research exploring environmental influences on human health and wellbeing which encourages the connection of planning with health initiatives. We should, therefore, seek to protect our green belt land and pursue the redevelopment of brownfield sites – 'previously developed' land. The current Brownfield Register indicates that some sites remain available for development.

* 2. The Council's overriding purpose is to improve people's lives and its core policies are addressing the climate and nature emergency (Page 8 paragraph 9). Therefore, the Council's Climate Emergency action should recognise the value of Green Belt designated areas and green space in maintaining the quality of our environment by reducing air and noise pollution and increasing wildlife.

* 3. There is surely uncertainty as to the longer-term impact of the Coronavirus Pandemic and consequently planning assumptions. It may be that additional agricultural land will be needed to grow local produce. It is certain that some businesses will not survive, with the sad consequence of unemployment. Developed sites and premises may have to be put to new uses and new methods of working will be established. There is likely to be more home working, and a larger proportion of meetings will be conducted by remote conferencing methods. The nature of society as we know it may well change and until we can gain a picture of this new environment, it would be prudent to ensure the continued protection of all our green belt and green spaces whilst assessing any re-purposing of already developed sites.

* The Council's core policy of 'giving people a bigger say' means that the partial update of the Local Plan should be prepared with community and stakeholder engagement (Page 13 paragraph 22). I think that it is possible that the current online method of commenting on the Local Plan Partial Update document may mean that those without internet access or experience will not have a voice in the process.

I would like to be registered, please, and notified of future stages in the consultation process.

With thanks. Clare Goodhart

Respondent Clare Griffin-Felton

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

To BANES Planning Officer and Department

I am disappointed that I am having to make another objection since the previous Gladman housing application and given that BANES objected to it too. It seem incomprehensible that BANES has still included RAD 25 and RAD 26 in the Local Plan given the council itself objected to a housing planning application for the same or similar reasons.

I, therefore confirm that I strongly object to the inclusion of RAD26 and RAD25 as possible areas for housing development in BANES Local Plan for the following reasons:

RAD26

* The land is a Greenfield site, which has been used to productively grow arable crops for at least the last 200 years. It is valuable farmland that produces local food. The Government advises councils to avoid building on agricultural land. There are several Brownfield sites in our area, which should be developed as a priority. Writhlington has already exceeded the quota for new houses with more than 60 built in the last two years and which has caused additional infrastructure and safety concerns ever since.

* RAD26 offers provides open space, strengthens existing landscape features and views to the open landscape. This field is also a vital habitat for a number of species as recorded by local residents. Writhlington is an area rich in history, flora and fauna; this historic and natural environment needs to be preserved for future generations.

* As stated before in all consultations and agreed by BANES planning, the infrastructure will not support such a development with local services such as the doctor and dentist already stretched beyond capacity. I cannot get a local dentist! Public transport is exceptionally poor, and due to the very hilly nature of the area it's inappropriate to suggest people could walk or cycle to work, shop or access local services. A development here would be car dependent as there are few opportunities for work in Writhlington meaning that people would be forced to use their cars.

* The road system will not be able to sustain further pressure generated by another housing development.

The A362 is already a busy road with hidden dips, access to/from a new development and the increased traffic would add significantly to safety concerns. The 5-way junction of Frome Road/Knobsbury Lane/Manor Road/Old Road is dangerously congested and frequently gridlocked, particular at peak times and is extremely hazardous for drivers and pedestrians at peak times. I have to leave for work 25 minutes earlier than is necessary in order to get off my driveway and out of Manor Road. Since the stopping of the lollypop lady, it has become even more hazardous. Regular traffic collisions occur at this junction, despite the newly installed speed camera and the pelican crossing. The safety of the students from the 3 schools, who are forced to navigate it, is already compromised. Additional traffic, generated by another housing development, will only exacerbate the problem. The recent development, Orchid Way, has already added further to congestion here. The rejection of an application by BANES to build 160 houses in Writhlington in 2019 stated that the development would have a 'severe and cumulative effect' on the road system in Radstock.

Some traffic from any development would inevitably need to use two single-track lanes, Green Parlour/The Coombe and Church Hill, which lead to Bath. These roads lead to a 1.8m wide bridge, with a 3-ton limit and a blind 90-degree bend underneath the railway arch. They are prone to extreme water run-off, and in winter are often dangerously icy, causing accidents. There are frequent road blocks due to the amount of vehicles trying to pass each other. These single-track lanes are excessively used, making it dangerous for walkers, horse riders and cyclists and also provide the nearest access from Writhlington to the cycle way as cycling down the busy A362 without a designated cycle lane is just not safe or appropriate.

* The Government, BANES and Radstock Councils have all declared a Climate Emergency. Any housing development must not result in out commuting, with additional vehicles on our roads adding to congestion and pollution.

* There is very strong feeling amongst villagers in Writhlington against further development here. In 2019 over 230 objections were made to BANES protesting a planning application on RAD26.

RAD25

NB All of the above objections apply to RAD25 as well as the following:

* The area identified as RAD25 is inaccurate as it includes a Grade 2 listed building, which is privately owned, and the owner has no intention to sell.

* RAD25 has been used for agricultural purposes for years and is used to rear free-range poultry and has beehives producing honey.

* A development of the site would be very visible from the valley and would be detrimental to the landscape and visual character of the area.

* Access to the site would open on to Church Hill or Manor Road. Drivers would undoubtedly turn right

out on to Church Hill to take a short cut to the Peasedown bypass driving through the two Conservation areas in Lower Writhlington across the narrow bridge over the Wellow Brook and under the railway arch which is on a blind bend. Or left, to add to the additional congestion outlined above. This development would make safe access to this green space even more hazardous and is approximately 80 metres from the single-track part of Church Hill, which is extremely steep, mostly single track with blind corners. The road is dangerous as it's in poor condition, there's a spring that runs onto it as well as run off from the hills and from down Manor Road.

* This site supports a wide range of wildlife, such as bats, deer, slow worms, hedgehogs as well as a huge variety of birds, which would undoubtedly be adversely affected by this development.

* RAD25 and the immediate area surrounding and near it are rich in history with The Monmouth Stone, a Standing Stone registered by The South West heritage Trust on its boundary with Church Hill, an ancient Lime Kiln in an adjacent field as well as two Grade 2 listed buildings adjacent to it. There are further listed buildings in the Conservation Area at the bottom of Church Hill as well as the site of Writhlington Manor, which has links to George Washington. The Batch at the site of Lower Writhlington Colliery is well known for being a rich source of fossils.

I hope that from reading the objections that RAD26 and RAD25 will not be included as possible areas for housing development in BANES Local Plan.

Yours faithfully

C P Griffin-Felton

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Clive Honeychurch

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear sir/madam

I am responding to your call for comments for consideration in respect of the proposed partial update of the Bath and North East Somerset Core Strategy and Placemaking Policy.

I am doing this via the 3 attachments:

Update of Core Strategy and Placemaking June 2020

supported by:

Notes on Keynsham through-traffic based on ch2m Study

Survey of Public Off-Street Car Park Usage in Keynsham Between 6th February 2017 and 16 March 2018

Please note that I am responding from a new email address which should be used to replace the one used in your call for comments (i.e. [REDACTED] should no longer be used for further communications).

Yours faithfully

Clive Honeychurch

Attachment included with response. Please contact to request to view

Respondent Clive Rogers

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Objections to Proposed Local Plan

Reference: RAD25 & RAD 26

I live in Writhlington within walking distance of the two above sites.

I wish to object to the proposal to consider these sites as possible for large developments of houses.

The traffic on Manor Road is often fast moving and dangerous and this is a residential road. Drivers use this road and Church Hill and onwards as a short cut from Peasedown St John, particularly when travelling to the schools or sports centre in Writhlington. Also, drivers that are intending to travel onto Frome, Shepton and beyond cut through this way. The lanes are small, high hedged, hilly and winding and simply not suitable to take the traffic that currently uses them, let alone the large amount of extra traffic that any planned development of this size would mean. There is no work in this area, so people are forced to travel to either Bath or Bristol. They cannot do this by bus as they do not run regularly enough. So the roads are bound to take the burden of the commuters. This will lead to more accidents.

Living on Manor Road, we often hear the number of police sirens and ambulances called to attend incidents on the main road. I was myself involved in an accident a couple of years ago at the crossroads at the top of Terry Hill. This has always been an accident blackspot area as cars travel too fast on their approach to the crossroads from all directions and are not careful enough when crossing over. My van was written off as I was stationary, waiting to turn right from the direction of Faulkland onto the main road to go down to Writhlington. A car that was crossing from the direction of Kilmersdon collided with a car coming up from Writhlington and they both hit me. Luckily I was not seriously injured but many people are not so lucky. Any increase in traffic on the roads around this area will lead to more accidents and possible fatalities.

There used to be a school crossing patrol at the end of Manor Road but this has now been discontinued, making it more dangerous for young children in particular who have to cross over to get to St Marys Primary School. The lane in which that school is situated is narrow and there is little room for traffic at all down there. More houses would mean more children and more traffic.

There are double yellow lines designating non parking areas at the end of the road as well but these are often obscured by parked cars, visiting the shop or the village hall. More traffic would make all this worse and more dangerous.

We have already had more than our share of housing development, of course I understand the need for more housing opportunities but there remain Brownfield sites that have not been touched. There is a large industrial area in between Midsomer Norton and Welton which is unused and looks a complete mess, surely this should be used before considering extending the housing boundaries and using farmland? The site in question is a disgrace and hardly helps to encourage people to use Midsomer Norton High Street and the shops and facilities there. Anyone coming from outside the area would be appalled with the look of the place, it would definitely put you off moving house or setting up a business for instance. I do not know who owns this industrial land but I am aware of the profit that would be gained by the estate of Lord Hylton if this farmland is used for housing development. This profit will not help the community in any way but will line the pockets of the Hylton Estate. I would further suggest that if the Hylton Estate no longer wish to farm this land then they should consider gifting it to the villagers of Writhlington for use by the community.

Please consider the safety of the residents of the village of Writhlington and surrounding areas before including this land for possible housing development.

Thank you.

Clive Rogers

Respondent Cllr Born

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

1. Any future developments of purpose built student accommodation should be on the university campuses. 2. In areas with high density of student accommodation, either purpose built or HMO, there should be no further expansion of HMO's, including enlargement of existing properties and there should also be no development of high density, co-living accommodation. 3. All new applications for HMOs or co-living accommodation should be considered by the planning committee and consideration should be given to the impact on existing residents, particularly in relation to pressure on parking, refuse disposal etc. 3. Standards of student, HMO and co-living accommodation should be revised to reflect the likely need for social distancing to be observed by residents due to the threat of further pandemics increasing with climate change. This should be applied retrospectively to existing accommodation too. 4. Any planning permission for student or co-living accommodation should prohibit its use for short lets such as Air B&B. 5. How will the review enable local planning policy to support action to address the climate emergency?

Do you have any comments on the programme for the preparation of the Local Plan Partial Update? ASAP please!

Do you have any other specific observations to make on the Local Plan Partial Update?

It would be helpful if this update could include a strategic vision for B&NES against which all decisions should be made. For example: 1. What sort of tourist offer do we want to make for the City and surrounding area? 2. Are there any types of tourism

What are your views on the new Draft Statement of Community Involvement?

The weight of residents views should be an important consideration where a development is likely to have a significant impact on a neighbourhood eg the recent Hartwells application.

Respondent Cllr David

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated? RESPONDING TO CLIMATE CHANGE Climate emergency I look forward to seeing enhanced policies to ensure that Bath and North East Somerset Council can deliver against our aim of achieving carbon neutrality in B&NES by 23. Planning policies must urgently support and enable:

- Energy efficiency improvement of the majority of existing buildings (domestic and non-domestic) and zero carbon new build;
- A major shift to mass transport, walking and cycling to reduce transport emissions;
- A rapid and large-scale increase in local renewable energy generation.

Nature Conservation The climate emergency brings with it major threats to our natural environment, with many species and habitats already in decline. I would like to see stronger measures to ensure that our approach to planning and development does not lead to further loss of native species and habitats. This should include:

- Strengthening of policy NE3 to ensure that all development leads to a net gain in biodiversity – in order to ensure that we reverse the current trend of ongoing extinction of species.
- Strengthening of policy NE4 so that all developments MUST demonstrate enhanced ecosystems services. This policy will need to be underpinned by a recommended approach for measuring the benefits of eco-system services at each site.
- Strengthening policy NE5: Ecological Networks so that each development proposal MUST demonstrate what contribution will be made to ecological networks as shown on the Policies Map through habitat creation, protection, enhancement, restoration and/or management.
- Strengthen policy NE6 on trees and woodland conservation so that it ensures that all new development ensures no net loss of trees and contributes to the wider tree planting policies in Bath and NE Somerset.

LAND SUPPLY PMP:SB17 Englishcombe Lane

- As part of the review of existing allocations REMOVE land to the rear of no 89-123 Englishcombe Lane This site is the subject of an ongoing planning application. There has been an ‘in principle’ objection raised by the council’s ecologist to this proposal due to its impact on the loss of ecology on a designated site of nature conservation interest. The council’s ecology officer stated that the harm will include permanent loss to irreplaceable rare habitat. They also noted concerns about the likely impacts on bat activity. Bath and North East Somerset Council declared a Climate Emergency in 219. Alongside the duty to dramatically reduce carbon emissions so as to minimise the future impact of climate change, we must also act now to stop the irreversible decline in habitats and biodiversity. Since the 197s the UK has seen a decline in both the abundance and distribution of our native species and habitats. The latest State of Nature Report (UK) finds that one in seven species are threatened with extinction. Almost one in five plants are classified as being at risk of extinction, along with 15% of fungi and lichens, 4% of vertebrates and 12% of invertebrates. The Wildlife Trust states that we are seeing the loss of irreplaceable habitats due to development happening in the wrong place “schemes to protect rare species are often ineffective and wildlife becomes restricted to increasingly fragmented areas”. At the same time, people living in urban areas are increasingly cut off from the natural world. Bath is a city characterized by its green spaces. These are part of the visual appeal of the city but they are also important to people’s health and well-being. This land is visited by bats, deer and other wildlife that are able to enjoy the connectivity between the green spaces in south west Bath. As part of the review of existing allocations I would like to remove land to the rear of no 89-123 Englishcombe Lane from the Local Plan. I strongly support this land being retained and enhanced for its ecological value and connectivity with other remaining green sites. I am concerned that the development of this site will further degrade the quality and connectivity of green infrastructure in the south of Bath, and lead to a further loss of biodiversity. Whilst it may be possible to offset habitat losses through managing and enhancing land elsewhere, this loss will still have a long-term consequence that cannot be mitigated. Bath Spatial Strategy – Recreation ground Policy BA1 allows for the development of the Bath Recreation Ground: ‘subject to the resolution of any unique legal issues and constraints, enable the development of a sporting, cultural and leisure stadium’. I would like to see the text around this amended to be clear that any development of this site should not include a large car park for the new stadium, and that the planning of this major new development should

encompass a sustainable transport plan for staff, visitors and spectators. I share concerns of many residents that a large car park will generate an excessive amount additional car journeys per day in and around the local area. I do not believe that this is compatible with the declaration of a Climate Emergency in Bath and North East Somerset, both in terms of reducing air pollution as well as carbon emissions from transport.

PROMOTING SUSTAINABLE TRANSPORT Sustainable travel I would like to see policy ST1 strengthened so that large developments (1 dwellings or more) MUST produce a travel plan with forecasts for how many residents will chose active travel and with a demonstrable contribution to improving active travel infrastructure e.g. improved widened pavements, cycle lanes. There should also be a full assessment of local bus services that takes into account frequency of service and size of bus as well as the route.

Healthy air I would like to see policies strengthened in the plan so that the transport impacts of development are more fully taken into account. In particular would like to see a requirement that development must aim to be at least 'air quality neutral' and not cause or contribute to worsening air quality. On major development this should be demonstrated through an air quality assessment and, if necessary, proposed mitigation measures.

MEET HOUSING NEEDS HMOs The growth of houses in multiple occupation (HMOs) across the south of Bath is clear to all residents. Local residents are concerned about the change of use of smaller properties reducing the availability of smaller homes to rent or buy, as well as worsening parking and access to their properties. Although our universities make a valuable contribution to the city of Bath and the surrounding area, the impact of the transient student population on local housing stock, and communities, needs to be managed. I support the following proposals that have been developed locally:

- All future purpose-built student accommodation to serve Bath's Universities is to be accommodated on Universities' respective core campuses (adjacent to teaching, student services and social infrastructure).
- No purpose-built student accommodation will be permitted in an area where the HMO Article 4 saturation threshold has been reached or exceeded.
- HMOs in an area where the HMO Article 4 saturation threshold has been reached or exceeded may not expand their current permitted capacity.
- Development rights to increase a small HMO to 'sui generis' (i.e. large) HMO should be removed.
- Where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures; the expanded property should necessarily be considered likely to have a detrimental effect on local on-street parking where this pressure is already considered to be 'high'.

PARKING Parking standards During the lockdown period it is clear that many roads in the Moorlands estate (Moorfields Road, Chantry Mead and Cotswold Road and the Oval and surrounding roads) have insufficient parking for the number of vehicles owned by residents, with cars parked around junctions and on pavements. I would welcome support from the council to develop a parking strategy for this area that would review existing road markings and allocate car parking spaces so as to increase safety for pedestrians and other road users and make the best use of space. This situation is exacerbated by the number of homes that have been converted into flats or HMOs, bringing more individual vehicle owners into each home.

- Planning decisions for new HMOs must take into account the parking constraints in the surrounding area and include a more realistic assessment of vehicle numbers.

I have previously raised concerns regarding the government guidance used in the assessment of the number of vehicles that an HMO may bring, comparing this to a family home of an equivalent size e.g. 4 bed HMO = 4 bed family home. This standard does not work in areas where small family homes are converted in large HMOs. Councillor Jess David 3 May 22

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

No

What are your views on the new Draft Statement of Community Involvement?

Yes - I think this is a very useful document. It would be useful if it also referred to Joint Plans and the role of WECA.

Attachment included with response. Please contact to request to view

Respondent Cllr Hounsell

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I wish you to consider including policy RE7 for updating for the reasons set out below.

Large properties used for AirBnB party houses as a commercial operation -

Although it takes a while, it is reasonably straightforward to demonstrate that a residential dwelling has this change of use. What follows is that the owners may apply for a change of use from residential C3 category to residential C3 with commercial holiday let.

The problem is that the owners may not be actually be living there throughout the majority of the week but claim they are. This claim can be made for multiple properties. A site visit by a planning officer has at least a day's notice.

What seems to be needed is supplementary planning guidance for local planning policy RE7 or a re-write or update of RE7.

RE7 states "Change of use from a dwelling to visitor accommodation will be permitted PROVIDED 3a) that for LARGE properties, a SUBSTANTIAL private residential unit is retained."

This could be clarified by stating that:

The residential unit must be contained within the main dwelling (to stop owners decamping to an annexe or a caravan..)

The private dwelling must be the dwelling to which B&NES Council Tax bills are addressed.

There may be other changes or amended wording that would have the desired effect

An updated RE7 could be very helpful in controlling the proliferation of party houses in my ward and BathNES generally. At the moment, the wording is too weak to count for much.

There is an overlap between issues relating to the use of large properties for party houses in BathNES and the issues around HMOs.

What is the point of updating policies such as RA1 and RA2 if houses are taken out of normal family residential use for commercial gain?

This Local Plan update gives an opportunity to address this phenomenon of large properties being bought for use in a commercial business model. The general public would be amazed that the only policies we appear to use are those relating to significant harm to the amenity of neighbours after the harm has been occurring for some considerable time.

Regards

Duncan

Duncan Hounsell
Councillor, Saltford Ward
Bath & North East Somerset Council

Respondent Cllr Matthew Shearn - Radstock Town Council

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I am councillor on Radstock Town Council for the ward of Writhlington, I am sending this email because, like many of the local residents I strongly object to the inclusion of RAD25 and RAD26 as possible areas for housing development in the BANES Local Plan. I feel that if these site are designated for housing developments, this would put strain on the local infrastructure, destroy habitats for local wildlife, and increase the traffic on roads that are already heavily gridlocked during peak times.

It seems inappropriate to hold this consultation phase during a time when meetings to discuss these plans are not possible due to COVID-19. This comes across as a sneaky attempt to sideline any dissent towards these plans.

Best

Cllr Matthew Shearn - Radstock Town Counciller (Writhington Ward)

Respondent Cllr Rigby

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear All

My understanding is that the current phase of the local plan update is more to do with scoping of the work than the changes necessary to reflect the council's new priorities, so below please find the list of policies which need to be included in the partial review. Having spoken with Tim I understand the time to give input to these policies is after scoping.

So you know my criteria for inclusion,

1. as the climate emergency is the most important element to be considered for our vision for the area, anything which has a significant impact must be reviewed in light of the council's declaration. Specifically elements relating to private vehicle movements or parking must be reviewed, and anything which impacts negatively our stated aims round zero carbon by 2030.
2. As a member of planning committee I have thought of all the times I have had to make a decision contrary to what I believe is right, and what the electorate voted us in on, because we did not have a suitable policy to warrant refusal, and included all those elements for updating to better fit our aspirations. Examples would be around PBSAs and HMO expansion.
3. As an administration we also have as a key tenet involving meaningfully our whole community in any decisions, so the scope of this needs to be as wide as possible.
4. Doing this exercise when it's uncertain what the effect of covid 19 will be longer term is a challenge, but it would be wrong not to acknowledge that this will have an impact on our authority and should be reflected in the local plan

It made the document unwieldy if I imported the suggested updates and added my own. I agree with those elements suggested for updates in your draft, but think there are other equally important ones requiring urgent action.

I understand there will be a statement made at cabinet on Friday about changes to process, and policy, so they too need to be formally incorporated.

For your ease, I have used your numbering system. I know that's a lot I've suggested, and resourcing may be an issue. For your ease I have put them in the order of your document, I have some I would prioritise, and a subset of those I would prioritise over some you have earmarked for review currently if there is not sufficient resource to review them all.

Given my criteria above, the following need to be added in.

CS SD 1
CS CP5
PMP D 2
PMP D 7
PMP D 9
PMP H 1

PMP PCS1
PMP PCS3
PMP PCS8
CS CP 9
PMPLCR 4
PMPLCR9
PMPRE7
PMPSB2
PMP B3

In addition, I'd like to see a new policy about the usage of artificial and hybrid grass in the authority.

I'd like to know what the process is now, I sit on LDF so I'm sure it will come to that committee at some time. I am very keen to ensure we set up the rest of this administration, and further into the future in a way that delivers what we were tasked to do by the electorate.

Manda

Sent from my iPad

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Cllr Rob Langley

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

please could I place my objection to the RAD 25 and RAD 26 being included on the local plan. Only last year BANES itself turned down planning on RAD 26 sighting the the road net work and job opportunitites without trave are poor, further more it mentioned that the access on and off the site would have to be on a single carridgeway track. Writhington has already had its fair share of houses, whilst there are a number of brownfield sites in the area that have not yet been built on. Please leave the greenfield sites alone

Councillor Rob Langley

Sent from my iPad

Respondent Cllr Singleton

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good Afternoon

I strongly support this review of the Local Plan being taken as a key opportunity to drive B&NES strategy to address the Climate Emergency.

Specifically, I would like to see:

- * All new build developments being required to be zero carbon going forward.
- * There should be an expectation that new builds, including for single dwellings, will incorporate renewable energy – certainly solar PV, but ideally also solar thermal, heat pumps and other renewable technologies.
- * I would like to see a regime where those seeking planning permission for alterations/extensions to existing buildings know that their applications are more likely to receive a favourable outcome if renewable energy generation is intrinsic to the design.
- * Regulations need to be changed to allow effective retrofitting of existing housing stock, including listed buildings.
- * A pre-disposition to look favourably on ground-mounted solar, hydro and wind energy schemes. Active pursuit of geo-thermal and geo-pressure schemes.
- * Measures to encourage community-owned renewable energy schemes.
- * Green Belt protection, but village infill builds to be allowed where the community and/or Parish Council support them.
- * Wide-ranging promotion of sustainable travel – encouraging walking, cycling and use of public transport. Making car use – save electric or shared-ownership vehicles – expensive and inconvenient.

Many thanks

Alastair Singleton

Councillor, Saltford Ward

Renewable Energy Advocate

Bath & North East Somerset Council

Respondent Cllr Stephenson-McGall

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have the following policy suggestions for adoption into the Local Plan Partial Update:

- [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure).
- [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance:
 - No purpose-built student accommodation will be permitted;
 - No purpose-built high-density co-living accommodation will be permitted;
 - Existing HMOs may not expand/increase their current permitted capacity. This would include stopping the ability to sub-divide rooms, carry out loft conversions and ground floor extensions.
- [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed.
- [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants.
- [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants.
- [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath.
- [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking.
- [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls.
- [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose.
- [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year').
- PMP

ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space (especially to PBSA uses) and to provide opportunities for small and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

Not really although it should be on a shorter timescale.

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Respondent Cllr Stephenson-McGall

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

[PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure).

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

[PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social ba

Do you have any other specific observations to make on the Local Plan Partial Update?

[PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed.

What are your views on the new Draft Statement of Community Involvement?

[PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student acco

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Cllr Warren

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Simon - please find attached an initial local plan consultation response. It is possible that there may be more when I have had the opportunity to discuss further with Sustainability Team, but I am conscious of your tight timescales for review, and don't want to set them back.

Best regards

Sarah

Sarah Warren

Liberal Democrat Councillor for Bathavon North Ward

Cabinet Member (job share) for Climate Emergency and Neighbourhood Services

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Coal Authority

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Planning Policy

Following the policy consultation on 06 April 2020, please find attached our comments relating to the above policy.

If you would like to discuss any of the issues raised, please contact us.

Regards

Planning and Local Authority Liaison team

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Colino Violante

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I am objecting to the proposal for 370 homes to be built at the writhlington site I live at green parlour cottage writhlington the road outside my house is a rat run as it is .we have had so many near misses outside its a very narrow road. The junction at Writhlington in my mind is busy as it is so to allow another 5/600 more cars going in and out is crazy,

colino Violante

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Combe Hay Parish Council

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please find attached LPPU consultation response from Combe Hay Parish Council.

Robin Campbell
Clerk to Combe Hay Parish Council
[REDACTED]

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Compton Dando Parish Council 01

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam

Compton Dando Parish Council wish to make the following comments:

- * Any new development around the Parish must have the necessary infrastructure in place beforehand.
- * Brownfield sites should be used for development before the Green Belt.
- * All new buildings should be sustainable.
- * Different modes of transport should be linked with one another e.g. secure cycle racks at railway stations.
- * Improvement to community bus services.

Regards

Susan

Susan Smith

Clerk to Compton Dando Parish Council
[REDACTED]

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Compton Dando Parish Council 02

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/ Madam

The Parish Council have further points of concern:

- * It is thought that housing requirement numbers are inflated as some houses have already been built. This was mentioned by the Planning Inspector with regard to the Joint Spatial Plan.
- * There are concerns over an increase in rat running if more houses are built on the outskirts of the Parish.
- * There are concerns about the economic recovery following the Covid-19 pandemic, so it is even more important to have the infrastructure in place first.
- * There should be enough affordable housing built to meet requirements.

Regards

Susan

Susan Smith

Clerk to Compton Dando Parish Council
[REDACTED]

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Compton Martin Parish Council

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear George,

Thank you for granting us an extension. As you can see by the attachments, we have managed to hit the deadline.

Kind regards
Janie

Jane Griffiths
Clerk
Compton Martin Parish Council
The Old Mill, Mill Lane, Compton Martin BS40 6NA
Tel/Fax: 01761 221702
email cmpc_clerk@yahoo.com
Village Website : www.compton-martin.com
Parish Council Website : www.comptonmartinparishcouncil.org.uk

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P Please consider the environment before printing this e-mail. Thank you

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Cotswolds Conservation Board

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please find attached the response of the Cotswolds Conservation Board to the consultation on the Bath & North East Somerset Local Plan Partial Update.

Kind regards,

John Mills

John Mills MRTPI
Planning and Landscape Officer

Cotswolds Conservation Board

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Country Estates

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

Please see our representations, prepared on behalf of Country Estates in respect of their interest in 'Land west of the A37, Clutton'.

I trust the attached is of use and I would appreciate if you could confirm receipt of this email at your earliest convenience.

If you have any questions, please do not hesitate to get in touch.

Kind regards,

Daniel Millward

Senior Planner

Pegasus Group

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent CPRE Avonside

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

I have pleasure in submitting comments from CPRE Avonside on both the Local Plan Commencement document and the Local Plan Policies. These comments have been produced by our B&NES District Group who have detailed knowledge of the area.

We hope these ideas will be helpful and we would very much welcome the opportunity to discuss them with you - by Zoom if that remains the only practical method. We will be sending copies direct to a number of Councillors and suggesting discussions with them also.

Regards,

David Worskett FCIHT FRSA

Chair, CPRE Avonside

Attachment included with response. Please contact to request to view

Respondent Craig Shaw

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I wish to object to RAD25 and RAD26 as potential housing sites on the new Local Plan.

They are both productively farmed, RAD25 has a poultry farm and bee hive in the lower half and part of it forms a historical stone and a Grade two listed property! RAD26 has been arable farm land for over 200 years, providing a local farmer with very valuable income and food produce for the local population. BANES Green Infrastructure Strategy says a priority is 'increasing opportunities for local food production'. Losing agricultural land is not acceptable.

The top half of RAD25 contains a variety of trees including alder, red chestnut, ash, purple beech and eucalyptus. It is a haven for slow worms, grass snakes, hedgehogs, muntjac deer and periodically we have seen barn owls with other wildlife. Both RAD25 and RAD26 support a large bat population including horseshoe bats. BANES Green Infrastructure strategy states we must 'protect and enhance biodiversity' and 'conserve and enhance the natural environment'. Both these fields are the 'soft' places on the edge of the Radstock built up area, these natural habitats and beautiful landscapes quietly control the background to our health and wellbeing.

We need to put 'the value of nature at the heart of decision making' and 'protect all notable trees'. 'The distinctive character of the countryside surrounding towns and villages will be protected'. These sites are on the edge of Writhlington village and should be preserved.

The Government and BANES Council have announced a 'Climate Emergency' which must be the highest priority for making any future plans. We must minimise our commuting and reduce the number of cars on the road. People in Writhlington are all car dependent as there is very limited public transport which is certainly not suitable for commuters and no facilities apart from a small corner shop and a privately owned village hall. There is minimal employment here and even the new proposed Somer Valley Enterprise Zone has no sites in this area. The doctor and dentist surgeries which are oversubscribed are in Radstock down the steep and busy A362, a sick person would be unable to walk this on foot.

Climate Emergency measures include walking and cycling to work, again the hilly terrain negates this and access to the Green Infrastructure is down very steep narrow lanes with blind bends and no pavements. Both RAD25 and RAD26 would not provide housing that fulfils the Climate Emergency requirements.

Access to both these sites would be via already congested or unsuitable roads. The 5-way junction of Frome Rd, Knobsbury Lane and Manor Road is grid locked at peak times and has to be navigated by the children attending the three local schools. Even though there is a pelican crossing there have been accidents involving school children on several occasions.

Adding further cars here without a traffic light system would be unacceptable.

The A362 leads down to Radstock town centre and is also heavily congested during rush hour, this problem has been exacerbated by the new shopping area containing Proper Job and Subway. Cars queue to get in and out of the car park. This adds to air pollution from traffic fumes.

To avoid Radstock centre, drivers use the narrow country lanes to get to the Peasedown bypass. These have poor visibility and surface quality, blind bends, a narrow bridge and constant water run-off in the winter. These lanes are already unsuitable for the level of traffic currently using them and horse riders, cyclists and pedestrians are unable to utilize them, they need pavements and the bridge at the bottom needs widening or traffic lights installing.

BANES Core Strategy states that there is no immediate prospect of large scale funding to trigger road infrastructure improvements within the plan period

Last year a planning application was submitted for RAD26 (18/05683/OUT). It was refused. BANES Landscape, Highways, Archaeology and Planning objected as did 234 members of the public. If the application was refused surely this means this site is unsuitable?
RAD25 has all the same objections as RAD26 so should also be unsuitable.

Water run off is a significant problem in this area due to natural springs and since the building of Orchid Way on Knobsbury Lane there is significant local flooding during the winter months. Adding more houses would exacerbate these problems and produce potential for flooding and water course contamination in the Somer river at the bottom of the valley. Also the waste water treatment works at Radstock is already at capacity and is frequently in breach of environment agency standards due to the excess overloads and small capacity.

Potential housing sites need to be near good transport links, employment, medical and retail facilities. Residents must be able to walk, cycle or take public transport so that we reduce our carbon footprint and protect the future. RAD25 and RAD26 do not fulfil these criteria and must be removed from the Plan as unsuitable.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Crest Nicholson South West - Land at Manor Road, Saltford

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear BANES Planning Policy Team

Please find enclosed representations on behalf of my client, Crest Nicholson South West, in respect of their interests at Land at Manor Road, Saltford.

Please can you confirm receipt of this email for my records.

Kind Regards

Peter Atkin

Associate

Pegasus Group

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Crest Nicholson Strategic Projects

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good afternoon,

Please find attached consultation comments on the Partial Review. I would be grateful if receipt could be confirmed.

Kind regards

Kenny Duncan

Associate Planning Director

Crest Nicholson Strategic Projects

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Curo

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam

Please find attached comments in response to the consultation on the Commencement Document that will inform the proposed Local Plan Partial Update. Should you require any further information, please contact me without hesitation.

Best Regards

Denis

Denis Barry

Senior Planning Manager

Attachment included with response. Please contact to request to view

Respondent Daniel Stuart Aveyard

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have the following policy suggestions for adoption into the Local Plan Partial Update: 1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space

(especially to PBSA uses) and to provide opportunities for small and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?
No.

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Danny Groves

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Yes (see attachment)

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

Yes (see attachment)

Do you have any other specific observations to make on the Local Plan Partial Update?

Yes (see attachment)

Attachment included with response. Please contact to request to view

Respondent David Charlton

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I strongly object to the inclusion of RAD26 and RAD25 as possible areas for housing development in BANES Local Plan

RAD26

* The land is a Greenfield site, which has been used to productively grow arable crops for at least the last 200 years. It is valuable farmland that produces local food. The Government advises councils to avoid building on agricultural land. There are several Brownfield sites in our area, which should be developed as a priority. Writhlington has already exceeded the quota for new houses with more than 60 built in the last two years.

* RAD26 offers provides open space, strengthens existing landscape features and views to the open landscape. This field is also a vital habitat for a number of species as recorded by local residents. Writhlington is an area rich in history, flora and fauna; this historic and natural environment needs to be preserved for future generations.

* The infrastructure will not support such a development with local services such as the doctor and dentist already stretched beyond capacity. Public transport is very poor, and due to the very hilly nature of the area it's inappropriate to suggest people could walk or cycle to work, shop or access local services. A development here would be car dependent as there are few opportunities for work in Writhlington meaning that people would be forced to use their cars.

* The road system will not be able to sustain further pressure generated by another housing development.

The A362 is already a busy road with hidden dips, access to/from a new development and the increased traffic would add significantly to safety concerns. The 5-way junction of Frome Road/Knobsbury Lane/Manor Road/Old Road is dangerously congested and frequently gridlocked, particular at peak times and is extremely hazardous for drivers and pedestrians at peak times and regular traffic collisions occur, despite the newly installed speed camera and the pelican crossing. The safety of the students from the 3 schools, who are forced to navigate it, is already compromised. Additional traffic, generated by another housing development, will only exacerbate the problem. The recent development, Orchid Way, has already added further to congestion here. The rejection of an application by BANES to build 160 houses in Writhlington in 2019 stated that the development would have a 'severe and cumulative effect' on the road system in Radstock.

Some traffic from any development would inevitably use two single-track lanes, Green Parlour/The Coombe and Church Hill, which lead to Bath. These roads lead to a 1.8m wide bridge, with a 3-ton limit and a blind 90-degree bend underneath the railway arch. They are prone to extreme water run-off, and in winter are often dangerously icy, causing accidents. They are excessively used, making it dangerous for walkers, horse riders and cyclists and also provide the nearest access from Writhlington to the cycle way as cycling down the busy A362 without a designated cycle lane is not acceptable.

* The Government, BANES and Radstock Councils have all declared a Climate Emergency. Any housing development must not result in out commuting, with additional vehicles on our roads adding to congestion and pollution.

* There is very strong feeling amongst villagers in Writhlington against further development here. In 2019 over 230 objections were made to BANES protesting a planning application on RAD26.

RAD25

NB All of the above objections apply to RAD25 as well as the below

* The area identified as RAD25 is inaccurate as it includes a Grade 2 listed building, which is privately owned, and the owner has no intention to sell.

* RAD25 has been used for agricultural purposes for years and is used to rear free-range poultry and has beehives producing honey.

* A development of the site would be very visible from the valley and would be detrimental to the landscape and visual character of the area.

* Access to the site would open on to Church Hill or Manor Road. Drivers would undoubtedly turn right out on to Church Hill to take a short cut to the Peasedown bypass driving through the two Conservation areas in Lower Writhlington across the narrow bridge over the Wellow Brook and under the railway arch which is on a blind bend. This development would make safe access to this green space even more hazardous and is approximately 80 metres from the single-track part of Church Hill, which is extremely steep, mostly single track with blind corners. The road is dangerous as it's in poor condition, there's a spring that runs onto it as well as run off from the hills.

* This site supports a wide range of wildlife, such as bats, deer, slow worms, hedgehogs as well as a huge variety of birds, which would undoubtedly be adversely affected by this development.

* RAD25 and the immediate area surrounding and near it are rich in history with The Monmouth Stone, a Standing Stone registered by The South West heritage Trust on its boundary with Church Hill, an ancient Lime Kiln in an adjacent field as well as two Grade 2 listed buildings adjacent to it. There are further listed buildings in the Conservation Area at the bottom of Church Hill as well as the site of Writhlington

Manor, which has links to George Washington. The Batch at the site of Lower Writhlington Colliery is well known for being a rich source of fossils.

Reasons for objection to RAD25 and RAD26

1. They are Greenfield sites that are both being productively farmed. Farmland should not be built on.
2. The sites provide open space, strengthens existing landscape features and views to the open landscape.
3. The road system will not be able to sustain further pressure generated by another housing development. Increased traffic would have a significant impact on traffic congestion in Writhlington at the 5-way junction, putting the safety of children who attend the 3 schools at risk.

Increased traffic will also have a severe and cumulative effect on the traffic system in Radstock.

Some traffic from any development would inevitably use two single-track lanes that lead to Peasedown and Bath. These roads lead to 3t weight restriction over a very narrow bridge, and a blind 90-degree bend underneath the railway arch. They are prone to extreme water run-off, and in winter are often dangerously icy, causing accidents.

4. Public transport is poor, commuters cannot use it to get to Bristol, Frome, Bath or beyond for a normal working day.
5. The Government, BANES and Radstock Councils have all declared a Climate Emergency. Any housing development must not result in out commuting, with additional vehicles on our roads adding to congestion and pollution. We should be reducing not increasing traffic on the roads.
6. The infrastructure will not support such a development with local services such as the doctor and dentist already stretched beyond capacity. Public transport is very poor, and due to the very hilly nature of the area it's inappropriate to suggest people could walk or cycle to work, shop or access local services.
7. In the past 3 years over 60 new houses have been built in Writhlington that has already placed significant pressure on our infrastructure.
8. Writhlington is an area rich in history, flora and fauna; this historic and natural environment needs to be preserved for future generations.
9. There are Brownfield sites that have not been developed in the Somer Valley. These should be developed before Green fields are even considered.

10. Within the area there are many houses for sale and rent, including many new houses that have not sold.

11. Even with sustainable drainage there will be significant water run off with additional houses.

Best Regards

David Charlton

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent David Graham

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please find attached submission

Regards

David Graham

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent David Martin

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

No comments

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

The programme seems to require a very long time to reach completion. Given that it is an update, not a full new plan, should the Council aim to finalise the process in a much shorter time, say less than 12 months.

Do you have any other specific observations to make on the Local Plan Partial Update?

The policies relating to the Climate Emergency need to be dealt with as a matter of urgency whilst still being appropriate for the Council's district.

What are your views on the new Draft Statement of Community Involvement?

No comments

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent David Milliner

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

No

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

What are your views on the new Draft Statement of Community Involvement?

No

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent David Morrison

Response Type: Online Form

What are your views on the new Draft Statement of Community Involvement?

Response to B&NES Consultation on Statement of Community Involvement for Planning April 22 Dear B&NES District Council, I submit the following comments to your Statement of Community Involvement for Planning, April 22 consultation doc. 1. Only

Respondent David Morrison 01

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Response to B&NES Consultation on Statement of Community Involvement for Planning April 2020

Dear B&NES District Council,

I submit the following comments to your Statement of Community Involvement for Planning, April 2020 consultation doc.

1. Only consultation submissions made by Parish Councils which carry a General Power of Competence as set out under the Parish Councils (General Power of Competence) (Prescribed Conditions) Order (2012) should be accepted as legitimate; and that where a Parish Council does not meet this criteria then its submission should be ineligible. The General Power of Competence requires that two thirds of members of a Parish Council are directly elected and are not simply cooptees or appointees; and that the Clerk to the Parish Council has suitable qualifications.

2. Bath and North East Somerset Council's Statement of Community Involvement for Planning (Consultation Draft April 2020) provides advice and guidance on the wider community consultation that Town and Parish Councils should undertake in order to inform their own submissions to the Local Plan. However, it is unclear nor demonstrated anywhere how Bath and North East Somerset Council will ensure that such community consultation is undertaken, or what weight will be added to those Town and Parish Council submissions where effort has been made to involve the wider community in determining a local view. This requires clarification and guidance in the final document.

It is important to address these two critical points as there are several references in the B&NES Core Strategy that refer to expectations of Parish Council involvement in strategic planning advice and delivery e.g. Page 124 point 5.21 of the Core Strategy clarifies that 'The allocation of sites will be considered through the Placemaking Plan in conjunction with Parish Councils as the locally elected representatives of their communities'.

Thank you

Yours faithfully

David Morrison

Respondent David Morrison 02

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear B&NES District Council,

I submit the following comments to your Local Plan Partial Update April 2020 consultation doc. Local Plan Partial Update

Pg 9 Pt 13b - Add Protection of Groundwater to list.

Pg12 Pt 16 Add to evidence base Groundwater, underground hydrology audit to include Water Wells, Boreholes and Underground Water Courses. The reason Bath and surrounding villages only exist because of underground water. Harm any of these and you risk losing not only a Bath Spa World Heritage Site but also future sustainable water supplies. Any lowering of water tables will cause the green infrastructure ecology and habitats to die and or change drastically. Water is key to the B&NES area and it should be the starting point of any Sustainability Plan.

Pg 12 Pt 18 - 21 Working with neighbouring authorities should include groundwater also in every sustainability appraisal. There is no certainty how the waters of Bath are fed other than from groundwater. As most of the land is limestone based it is clear that limestone aquifers play a vital part in sustaining a permanent flow of water that should not be interrupted or polluted in any way. Statements of Common Ground between neighbouring authorities should include Groundwater policies.

Anything that harms the groundwater heritage or the water table asset could harm not only water supplies locally but also the City of Bath.

David Morrison

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent David Morrison 03

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear B&NES District Council,

I submit the following comments to your Local Plan Partial Update Policy Review April 2020 consultation doc. Local Plan Partial Update

Local Plan Partial Update Policy Review

The consistency of some of the Policies in the partial update shown to be reviewed and those that are not, creates conflict with the policies written in the current Core Strategy.

I give two examples but there are more and the danger is the ambiguity and confusion that will be created by not adhering to the already adopted Core Strategy.

DW1 - Page 5 of the Core Strategy (CS) DW1 Refers to Table 9. Yet on Page 177 of CS it states that 'the review (5 year) will be informed by regular monitoring as set out in Table 9'. It is explicit in the CS policy that 'DW1 should be reviewed as part of any update'.

PMP CP8 - Page 124 of the Core Strategy, 5.20 Housing. It states Policy RA1 should be considered alongside Policy CP8 Greenbelt. If Policy RA1 is being considered for update review then so should Policy CP8

Any Local Plan partial update must be consistent with the current Policies in the already adopted Core Strategy and Placemaking Plan.

David Morrison

Respondent David Redgewell

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Support more purpose built student accommodation and improvement in walking and cycling strategy to new developments support development of housing in whitchurch and Stockwood the plan a local plan and green belt barriers between whitchurch village whitchurch park and Stockwood. Public transport improvements by Bus service to keynsham station and Bristol city centre With a metro bus route to Bristol and Hick gated We welcome new housing in keynsham east But wish to see a new park and ride site at Hick gate we would like to see a light rail line from Bristol city centre via the st Phillips causeway callington road link to A4 corridor via keynsham and the river valley to pick up the Midlands railway line to Bitton kelston weston and Bath city centre and towards Batheaston and Bathford . Their needs to be a light rail link to peasdown st John Radstock and midsomer Norton and shepton mallet. Their needs to be a light rail link from Bath city centre to Kelson Bitton oidland warmley new route to mangotsfield staple hill Fishponds Easton and Bristol city centre. In Bath city centre more pedestrians car free street need to happen especially with Social distancing. More housing needs to be provided for affordable housing in Bath city centre on the waterfront development On Bath Quays North and south.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

The duty to cooperate is important with Bristol city council south Gloucestershire weca mayoral authority and North Somerset council. But especially also with mendip district council and Wilshire council Swindon and somerset county council in Bath city

Do you have any other specific observations to make on the Local Plan Partial Update?

Public transport corridor need development in Bath to lansdown Bathford Batheaston odd down Radstock midsomer Norton via bear flat s and peasdown st John. To saltford keynsham Brislington arnos vale Bristol Temple meads station and city centre. Bus and m

What are your views on the new Draft Statement of Community Involvement?

The statement of community involvement needs to include more disabled and equalites group s weca transport forum group s

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Deeley Freed Estates & Legal and General Build to Rent

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam

DEELEY FREED ESTATES & LEGAL AND GENERAL BUILD TO RENT FUND

B&NES LOCAL PLAN 2011-2029 – PARTIAL UPDATE

COMMENCEMENT CONSULTATION

I am please to submit comments on the Local Plan Partial Update Commencement, on behalf of Deeley Freed Estates and Legal and General Build to Rent Fund.

The comments are combined on the attached pdf document and relate to the following policies:

- * CS CP9 – Affordable Housing
- * PMP H2 – Houses in Multiple Occupation
- * PMP H7 – Housing Accessibility
- * PMP ST7 – Transport Requirements for Managing Development
- * PMP SB10 – Roseberry Place Development Requirements and Design Principles

I will be pleased to address any queries relating to the attached representations.

Regards

Chris Hays MRTPI MIHBC

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Des Wighton

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Seems comprehensive

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

no

Do you have any other specific observations to make on the Local Plan Partial Update?

No

What are your views on the new Draft Statement of Community Involvement?

No

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Dr. Christopher Lewis-Smith

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Planning team

I wish to raise my concerns regarding the areas on RAD25 and RSD26 as suitable for housing development. I have put my concerns in this 70 second video <<https://www.youtube.com/watch?v=f-WCrTrW6tA>> which I would be grateful if you would watch.

Thank you

Kind regards

Chris

Dr. Christopher Lewis-Smith
Course Director Postgraduate Dance, Bath Spa University

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Duchy of Cornwall

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs

Please find attached responses, on behalf of our client the Duchy of Cornwall, to the current consultations on the LP Partial Review Consultation Document and the Policy Review Document.

A separate response on the consultation draft of the updated SCI will be sent to the separate 'planning policy' email address, as indicated in that consultation document.

Please could you confirm safe receipt in the first instance? If you do require any further detail or information at all please do not hesitate to come back to me.

Kind regards,

Sam Harper
Associate Planner

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Dunkerton & Tunley Parish Council

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dunkerton & Tunley Parish Council is concerned that rural transport issues will not be properly examined within the proposed scope of the review. We would consequently argue that the scope should be extended as below. The provision of rural transport services is important in context of: - Planning transport infrastructure to support sustainable development. For example, we are very concerned about the adverse effect that traffic emerging from the Southstoke development will have on the heavy, predictable rush hour traffic flows along the A367 and B3115 towards the Odd Down roundabout. - The risk of even longer, more regular tailbacks along the A367 and the B3115 is dependent upon how people choose to commute – commuting both through and from our parish to the cities and towns. - Transport planning to meet additional needs of rural residents across rural BANES is also important - for social engagement, medical appointments and school transport. - Minimising car use: this will be necessary if the authority is to deliver on its objectives for a Clean Air Zone and more widely in response to its declaration of a climate change emergency. Our particular concern is that, unlike the other rural areas in BANES (for example <https://www.bathnes.gov.uk/services/parking-and-travel/transport-plans-and-policies/chew-valley-transport-strategy>), parishes along the wider Cam Valley cannot refer to a BANES transport strategy to understand how relevant policies, processes and action plans might be formulated to enable any revised Local Plan. There is, and would be, no structure, visibility or governance that we as a parish council could understand in trying to deliver against the plan. As importantly, we would not be able to explain to concerned parishioners the rationale behind key decisions in the planning of rural transport services. These risks would be concerning at any time, but they are all the more serious now as some responsibilities for the design, procurement and management of key rural transport services is being centralised within the new West of England Combined Authority (WECA). We all need to understand how these new competencies will be discharged to enable effective delivery of the Local Plan. Without a rural transport strategy for the Cam Valley, we and the other Cam Valley parishes are blind-sided as to this vital change and are left to guess what might happen. We therefore believe that the issue of future rural transport needs to be better encapsulated within the partial review. We believe that BANES' intention and willingness to publish a Cam Valley Transport strategy must be clarified and articulated as part of the review of: PMP:ST1 Promoting sustainable travel PMP:ST5 Traffic Management Proposals PMP:ST7 Transport requirements for managing development

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

Yes with reference to the policies PMP: GB2 Development in Green Belt villages. The opportunity to increase the number of properties within green belt villages to ensure the long term viability of these settlements is seen as a good thing. However

What are your views on the new Draft Statement of Community Involvement?

No comment

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent East Harptree Environment Group

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Chris Johnson
Secretary, East Harptree Environment Group
28th May 2020

Dear Sir / Madam,

Consultation on the Bath and North East Somerset Local Plan 2011 – 2029 Partial Update

East Harptree Environment Group is a constituted body set up to concentrate on projects that help conserve village and parish wildlife and raise interest and awareness and, ultimately, to create an East Harptree wildlife strategy and map that will help guide future initiatives.

The Steering Committee of the Environment Group hereby submits the attached comments in response to the consultation on the Partial Update of the B&NES Local Plan.

We trust that you will consider our consultation response to the Local Plan Partial Update with care.

Yours faithfully,

C Johnson

Secretary

cc: Councillor Sarah Warren

Councillor David Wood

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent East Harptree Parish Council

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs,

I have set out below the Local Plan Partial Update Consultation response from East Harptree Parish Council. Also attached are the responses from both our Climate and Nature Emergency Working Group and the Village Environment Group which are supported by the Parish Council.

Response Begins:

1. Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

More interaction is needed where there is an existing 'made' Neighbourhood Plan:

Under the heading, 'Scope of the B&NES Local Plan Partial Update', paragraph one refers to the Core Strategy and Placemaking Plan, stating, "Together these Documents form the Local Plan for B&NES". We would note that once made, Neighbourhood Plans also form part of the statutory Development Plan and have the same legal status. However, we cannot see evidence of that being taken into account by this process. Good practice would embrace consideration of the status of Neighbourhood Plans, ideally showing sensitivity and respect for their content, to help inform reviews and updates. Proper consultation in advance, and in anticipation of updates which could produce conflict with existing Neighbourhood Plan policies, would help facilitate positive outcomes.

We understand and concur with your reasons for undertaking this Partial Update. However, it is our view that some crucial policies relating to the Climate and Nature Emergency, and the Environment, have been omitted. We attach separate letters from our Climate and Nature Emergency Working Group and from the East Harptree Village Environment Group. Their responses in respect of the relevant policies together with summaries of why they should not be left until a future New Local Plan, have been approved by East Harptree Parish Council. Our responses to other policies are listed below:

Policy PMP: RA2 Villages:

We agree that this policy should be reviewed and would comment as follows: The designation of rural settlements to one of two categories, currently RA1 and RA2, is based on a list of local facilities. The Placemaking Plan then attaches one of two quotas to each and these, it considers, represent sustainable development. In the case of RA2 settlements such as ours, that figure is 10 – 15 dwellings and in our view, whilst that might be reasonable in some RA2 villages, it cannot be assumed to be the case.

Whilst available facilities may be a useful starting point, this is often far too broad an approach to consider properly what is sustainable in individual villages. Whatever number is allocated to RA2 settlements, there are other factors that must be considered before a sustainable figure is determined for an individual village. These should include: Topography; Parking and Accessibility; Pedestrian Safety; Public Transport; Utilities and Services; Local Employment and most importantly, the impact in respect of the Climate and Nature Emergency. We also strongly question the assumption that every five years there will be an allocation of

dwelling to all RA2 villages outside of the Green Belt. There must be a proven need for the type of development proposed.

Even then, it is also our view that the level and density of any development in small villages should be consistent with their Parish Character Assessment. To avoid the sort of slow sprawl that is ruining many rural areas, this essential character must be protected, especially in AONBs. This also reflects Paragraph 122, d) of the Revised NPPF (National Planning Policy Framework).

Policy CS: CP5 Flood Risk Management:

In our view this policy, currently omitted, should be included in your review. When developers carry out a Flood Risk Assessment they typically only check against the Environment Agency flood risk from Rivers and Seas (i.e. flat area flooding). For communities on steep slopes, such as the Mendips, they will typically have the lowest risk from Rivers and Seas, but are particularly susceptible to Surface Water flash flooding. Please update this policy to also require the Flood Risk Assessment check to be done against the Environment Agency flood risk from Surface Water in the nearby vicinity as well, such that if either check shows an increased level of risk then this policy would escalate the requirements.

Policy CS: RA4 Rural Exception Sites: We would not want to see the wording of this policy changed.

Policy PMP: ST7 Parking Policy:

We agree that this policy should be included and would comment as follows: Each community has very different needs in respect of parking standards. Many rural villages do not have a full range of local facilities accessible via public transport and a high proportion of residents need a vehicle in order to work. This can result in a higher than average level of car ownership per household which, in reality, will not be reduced by fewer off-road parking spaces. Those same villages often have very narrow medieval lanes that get easily blocked for farm, emergency and delivery vehicles if cars have to be parked on the street due to insufficient off-street parking in developments. For reasons such as this it is important to give flexibility to different communities to be able to tailor their own minimum off-street parking standards. An example of this happening in practice is in the Chew Valley Neighbourhood Plan policy HDE8b. Also, in these same rural communities it is very common for any garages to be used for storage or converted to living space and so not be available as a future off- street parking space.

With an increasing number of households changing to electric or hybrid vehicles, this will not in itself have a negative impact in respect of the Climate and Nature Emergency. For these reasons, we advocate the following approach:

- * Define parking standards in different spatial areas.
- * Exclude garages and review the number of parking spaces for different sized dwellings.
- * Facilitate the above by defining parking standards in a separate SPD (Supplementary Planning Document). The Updated Local Plan policy should then just refer to the SPD or any made Neighbourhood Plan. This will allow Neighbourhood Plans to be used to define parking standards for the needs of specific communities.

2. Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No comments.

3. Do you have any other specific observations to make on the Local Plan Partial Update?

We have been made aware of concerns: As a Parish Council we are aware that some people have found the experience of taking part in this consultation less than straightforward and for some, off-putting. There is a great deal of new and therefore unfamiliar information and terminology, and the complete lack of prior briefing and meetings, combined with the difficulty of actually speaking to anyone for advice or clarification, has exacerbated the situation. Of course, most of this is due to the Pandemic, and we are aware that you say the Government is nevertheless directing you to progress Planning Policies. However, we do think that you could have given us background information, documents and written briefings, sooner than was the case and certainly prior to the first day of the Consultation itself. Also, if you could have found a way to facilitate easy access to the current policies, in order to inform assessments of the need for review or update.

4. What are your views on the new Draft Statement of Community Involvement?

The section on Neighbourhood Plans notes the Local Authority's legal duty to assist and advise in the preparation of new Neighbourhood Plans. However, the Commencement Document states that "In the light of the Partial Update some existing Neighbourhood Plansmay also need to be updated in part or in full." Whilst it goes on to say that, "this will be kept under review and Parish Councils advised accordingly" In our view, the detail needs to be firmed up in the Statement of Community Involvement which should, therefore, also address how B&NES will liaise with those communities with made Neighbourhood Plans. Once made, Neighbourhood plans form part of the statutory Development Plan and have the same legal status. Good practice would embrace consideration of the status of Neighbourhood Plans, ideally showing sensitivity and respect for their content, to help inform reviews and updates. The provision of proper consultation in advance, and in anticipation of updates which could produce conflict with existing Neighbourhood Plan policies, would be required and would help facilitate positive outcomes.

Figure 2 on page 7 of the SCI makes it clear that public site notices for local planning applications are not always displayed. We believe the general public have an expectation that such notices would always be displayed to alert them to local planning applications (even where immediate neighbours receive a personal letter). There is a danger that not meeting this expectation will harm the reputation of B&NES' planning process especially for those people who do not have access to online notifications. We would recommend that the B&NES's process is updated to always include publicly displayed site notices to address this expectation (even if that goes beyond the strict legal requirements). If this is not possible, then an alternative practical suggestion would be whenever a planning officer does not intend to display a notice and chooses to write to neighbours instead, that they also send 2 laminated copies of a site notice to the Parish Council which it could put up locally instead. (Note it is not reasonable to just assume that all parish councils have the resources to laminate and post notices themselves).

Response submitted by East Harptree Parish Council 31st May 2020

Alan Butcher

East Harptree Parish Clerk

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent East Harptree Parish Council Climate and Nature Emergency Working Group

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

Please find attached the formal response of East Harptree Parish Council Climate and Nature Emergency Working Group to the public consultation on the proposed scope and content of the Local Plan partial update.

Yours faithfully,

Bernice Roberts

Secretary

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Edward Ware Sites

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

Please see our representations, prepared on behalf of Edward Ware Homes in respect of their various land interests across BaNES.

I trust the attached is of use and I would appreciate if you could confirm receipt of this email at your earliest convenience.

If you have any questions, please do not hesitate to get in touch.

Kind regards,

Daniel Millward

Senior Planner

Pegasus Group

Attachment included with response. Please contact to request to view

Respondent Eleanor Ellington

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

The documents are couched in very broad terms which give leeway for future controversial developments to pass without being in any way constrained by the Local Plan. As regards Bath Recreation Ground, there is no specific confirmation that it is a Green Space to be preserved for the enjoyment of the residents of Bath as originally intended, which would of course preclude the construction of an 18, seat Rugby Stadium possibly over a congestion and pollution raising car park in what is meant to be a Clean Air Zone. The case for such a Stadium needs to be reviewed in the light of Covid-19 (see below). There are references to "affordable housing" with nothing to indicate clear measures for actually achieving it, bearing in mind that the MOD and Riverside sites constitute a major missed opportunity for this, so that the very limited land left should logically be largely devoted to affordable housing to redress the imbalance. There is a need for specific policies to address problems exacerbated by the effects on the economy of Covid-19 e.g.: accelerated closure of city centre retail units which possibly could be modified to provide affordable housing reconsideration of the scale of University of Bath development plans and the volume of student housing in Bath combined with proposals for alternative use of existing development which may be underused in the future. I do not have a clear sense of "This is what we need to do, and this is how we propose to do it, with a clear indication of how policies are to be linked".

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

This appears to be a very bureaucratic "tick-box", bland document without any sense of a strategic overview for a city which is meant to be of world-class Heritage Status which somehow has to be combined with meeting the needs of modern society.

Do you have any other specific observations to make on the Local Plan Partial Update?

This and other related documents have been available since April, but this was after the imposition of the "lockdown" in March necessitated by Covid-19. Therefore local residents have received inadequate notification of the documents and too little time

What are your views on the new Draft Statement of Community Involvement?

Community involvement seems farcical in that people are presented with policies in the form of generalised statements on which it is hard for them to make meaningful comments. Even the questions in this "form" are too vague and woolly, likely to give m

Respondent Emma Jukes

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

To whom it may concern, I am a resident of Writhlington and have been so for over 25 years now, residing at 9 Manor Terrace, BA3 3NF. My name is Emma Jukes.

I feel compelled to email you to register my objections. I have just had it drawn to my attention that there are still two productive fields in Writhlington earmarked as possible sites for large developments of houses and they are RAD 25 and RAD 26.

I do not understand why sites that have been identified as Brownfield Sites in the Somer Valley have not yet been developed but you are still considering the development of Greenfield Sites first - how can this be? Gladman tried to gain planning permission to develop RAD 26 last year and it was turned down.....the situation in Writhlington has not changed since then so why is it still marked as a possible site for not one but two large developments?

The road that I live on, Manor Road, would be one of the main routes through to both of these proposed developments. The road is just not built to take this increase in traffic. The addition of a substantial number of vehicles to the road as well as other local lanes will also have a detrimental impact on the safety of local children walking to and from school.

I have two daughters both in attendance at Writhlington Secondary School. They have 2 roads to cross to get to school and with both they take their life in their hands. Firstly just crossing Manor Road is bad enough with the increased volume of traffic at school time and having to negotiate a way safely through all of the randomly parked cars from parents dropping off and picking up their children from school.

They then cross on Frome Hill near the 5 way junction. Yes, there is a crossing and yes, they use it. But they are still putting their lives in the hands of the motorists who often fail to stop on the red lights in a timely fashion and some drivers don't stop at all. There have been numerous accidents on this junction in the past, with both pedestrians and motorists and that situation is only going to get worse with an increase in terms of traffic and people due to possible new developments.

We also do not have the local amenities to serve an increasing population.....we have a couple of parks with very limited equipment in them and one little village shop.....and that is it. This isn't good enough.

The local Doctor's surgery cannot manage efficiently with it's current numbers of patients and to try and get an NHS dentist locally is actually impossible.

The public transport that is currently in place to serve our population is inadequate to say the least - it certainly won't serve an increasing population.

We have very recently had the addition of 60 new houses in Writhlington built on a site that is totally unsuitable - please do not make that same mistake again.

For me this isn't just about common sense prevailing - it is more about what is morally correct, and the development of these two sites isn't.....it's as simple as that!!

Regards

Emma Jukes

Respondent Emma Shaw

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

To whom it may concern,

I wish to object to RAD25 and RAD26 as potential housing sites on the new Local Plan.

They are both productively farmed, RAD25 has a poultry farm and bee hive in the lower half and RAD26 has been arable farm land for over 200 years, providing a local farmer with very valuable income. BANES Green Infrastructure Strategy says a priority is 'increasing opportunities for local food production'. Losing agricultural land is not acceptable.

The top half of RAD25 contains a variety of trees including alder, red chestnut, ash, purple beech and eucalyptus. It is a haven for slow worms, grass snakes, hedgehogs and other wildlife. Both RAD25 and RAD26 support a large bat population including horseshoe bats. BANES Green Infrastructure strategy states we must 'protect and enhance biodiversity' and 'conserve and enhance the natural environment'. Both these fields are the 'soft' places on the edge of the Radstock built up area, these natural habitats and beautiful landscapes quietly control the background to our health and wellbeing. We need to put 'the value of nature at the heart of decision making' and 'protect all notable trees'. 'The distinctive character of the countryside surrounding towns and villages will be protected'. These sites are on the edge of Writhlington village and must be preserved.

The Government and BANES Council have announced a 'Climate Emergency' which must be the highest priority for making any future plans. We must minimise out commuting and reduce the number of cars on the road. People in Writhlington are all car dependent as there is very limited public transport which is certainly not suitable for commuters and no facilities apart from a small corner shop and a privately owned village hall. There is minimal employment here and even the new proposed Somer Valley Enterprise Zone has no sites in this area. The doctor and dentist surgeries which are oversubscribed are in Radstock down the steep and busy A362, a sick person would be unable to walk this on foot.

Climate Emergency measures include walking and cycling to work, again the hilly terrain negates this and access to the Green Infrastructure is down very steep narrow lanes with blind bends and no pavements. Both RAD25 and RAD26 would not provide housing that fulfils the Climate Emergency requirements.

Regards,
Emma Shaw

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Energy Efficient Widcombe

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

The Plan is complex and presented in a complex manner. There is a danger therefore that points will be overlooked. It is good that it is up for revision.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?
as above

Do you have any other specific observations to make on the Local Plan Partial Update?

It is vital that the Plan is updated realistically to take full account of [i] The Climate Crisis impacting on our Common Home. [ii] The paris agreement [iii] The local Council vote to declare recognition of the Climate Crisis. It is vital that additi

What are your views on the new Draft Statement of Community Involvement?

It is vital that Community Involvement is ongoing and conducted in a way that takes account of the diversity and variety of the population. Age ethnic group faith disability etc. So that populations can be reached wherever they can be reached and educated

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Englishcombe Parish Council

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

CSP.1 Retro-fit for existing buildings: use of downtown properties. For a city like Bath with a large stock of historic, and often unused or underused buildings, retro-fitting or just plain conversion would add considerably to the housing stock in central locations. This can be expensive and there are certain problems (such as car parking) which are difficult to solve, but with climate change and a post Covid19 world, car type and use and ownership patterns may change. Central location encourages walking and cycling to shops and to workplaces.

PMP.RA1 PMP.2 GB3 Green belt villages and small and infill sites: The paranoia surrounding any development in the Green Belt militates against even modest development which includes extensions, especially when the Green Belt 'washes over' a settlement. Eg: Englishcombe. Most new building is therefore either permitted extension or conversion of outbuildings / garages etc. Planning officials tend to play safe and by the book, rather than looking at projects 'in the round' as they might benefit the residents. If for example, there is land within the parameters of Green Belt, which could support a 'few' houses (to be defined by the circumstances), then interested public involvement with planning departments on site would make the design and planning decisions more transparent, understandable and hopefully more acceptable.

CSP.9 Self-build housing: This means of housing can and should play a part, but is only successful if commitment and knowledge is found in those who wish to undertake this path to home ownership. It is highly dependent on land values. It has good social implications where it succeeds.

PMP.SB20 Student accommodation (amount of): Location all important. All new accommodation blocks should be located on campuses for less student travel, quieter and cleaner streets.

PMP.ST1 Vehicle parking (electric charging sites) should be available in all settlement locations as not everybody has the facility to safely home charge. Parking in villages and towns is a problem where there is no, or little, off street parking. Will electric cars solve this problem through being more expensive to buy?

PMP.ST7 Local transport: Ongoing problem due to:

Expense (but not for those with concessionary passes)

Infrequency of service to outlying areas.

Insufficient subsidies

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

None

Do you have any other specific observations to make on the Local Plan Partial Update?

None

What are your views on the new Draft Statement of Community Involvement?

None

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Englishcombe Parish Council

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Not at this time

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

Not at this time.

Do you have any other specific observations to make on the Local Plan Partial Update?

Not at this time.

What are your views on the new Draft Statement of Community Involvement?

Not at this time.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Eric Lucas

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

There is Still to Much development that is essentially speculative in nature , (student Housing) and is seen as a Cash Cow. There needs to be tighter HMO rules, to allow more residential housing , there is a loss of affordable and rented housing to he student Market. The policy needs to steghten the ned to take into account the climate and Nature emergency. All planning and housing should have this at its core. There needs to be a policy of ensuring all new housing developments meet passive house standards and are not reliant on cars. There needs to be a emphasis on keeping and restoring green spaces with city and strengthen the green belt allowing no in fill , and promoting partial re-wilding

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

There needs to be a focus on the people of BATHNES and not on developers, and student interests .

Do you have any other specific observations to make on the Local Plan Partial Update?

The update is overdue the present local plan does not seem able to stop development that does not meed he Climate emergency

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Fairfield Nurseries, Chew Magna

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Local Plan Team

Further to your Notification below, please find enclosed a suitable Representation in respect of land at Fairfield Nurseries, Butham Lane, Chew Magna, BS40 8RQ.

At this stage I would be grateful just for an acknowledgement of receipt.

Many thanks

Chris Dance

Associate

LPC (Trull) Ltd

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Farrell & Co

Response Type: Postal



Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Farrell and Co

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam

I attach my response to the Local Plan update consultation. I would be grateful for an acknowledgement.

Yours faithfully

Martin Farrell

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Farrell and Co

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

When will the plan be open for consultation?

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

More time needed

Do you have any other specific observations to make on the Local Plan Partial Update?

No mention of Bath Recreation Ground

Respondent Fiona Etheridge

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space (especially to PBSA uses) and to provide opportunities for small

and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?
No

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent FoBRA

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs

In general FoBRA welcomes the Local Plan Partial Update and the Statement of Community Involvement, which are helpful to address many of the most important changes which have taken place since the local plan period began, especially the former. However, FoBRA believes there are a number of other areas which also need review and these are proposed in the attached paper.

This is being sent by this medium because Survey Monkey website is not used friendly.

Yours faithfully

Nicholas Tobin

Vice-Chairman

Federation of Bath Residents' Associations

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Frances & Jonathan Tecks

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Mr Daone and Planning Policy Team,

Attached is a brief comment on the Englishcombe Lane site which is subject to review as part of the Local Plan Partial Update.

We would be grateful if you would give it your consideration.

With thanks and regards,

Frances & Jonathan Tecks
??

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Friends of the Rec 01

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please find below Comment for the Local Plan partial update Consultation 2002

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Friends of the Rec 02

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

??????????

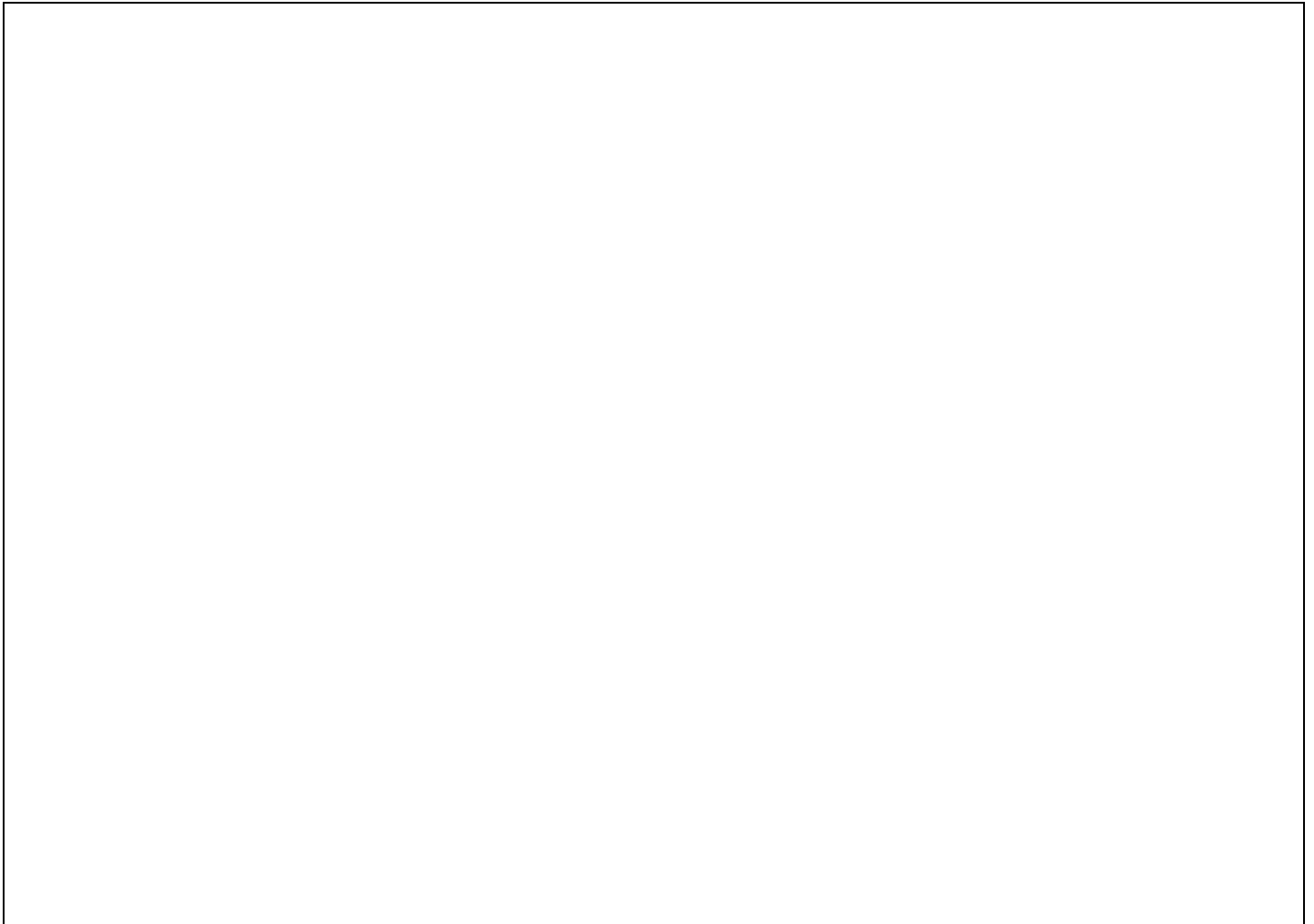
Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Friends of the Rec 03

Response Type: Email



Attachment included with response. Please contact to request to view

Respondent G Daniells

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I wish to register my objection to RAD 25 and RAD 26 being marked in the local plan as sites suitable for development.

We should be protecting our ever decreasing green ` breathing spaces ` and not building on agricultural land.

We should build on brown field sites first.

Congestion can only be made worse by traffic generated from any new housing development.

Any proposed development would add to those who are already commuting out of the area for work.

There is a limited choice of facilities in Writhlington which will not fulfil the requirements of all, leading to yet more car journeys out of the area.

I have concerns about the harmful effect on the ecology and biodiversity of the area leading to loss of habitat for plants, animals, insects and birds.

Yours sincerely G. Daniells

████████████████████

██████████

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent G M L SWIFT

Response Type: Online Form

Do you have any other specific observations to make on the Local Plan Partial Update?
YES

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Gail Harding

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I am emailing you to express my objection to RAD25 and RAD26 being marked as possible sites for development and I feel these should not be included in the Local Plan.

In my opinion there are no circumstances in which a productive greenfield site should ever be considered for development, even a field of grass has a use as it helps to provide us with the air we breathe.

Any development will bring more congestion to the area as there is very poor public transport and very few facilities in Writhlington thereby forcing people to take to their vehicles and the roads to go elsewhere.

We have a responsibility to preserve the environment for future generations who will not thank us for destroying all of the countryside around us, once it's gone it's gone for good.

Regards, Gail Harding

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Gary Lynch

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Student Accommodation

Do you have any other specific observations to make on the Local Plan Partial Update?

Student accommodation with no allowance for parking

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Gladman

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

In relation to the above consultation please find attached representations submitted by Gladman.

I would be grateful if you could confirm receipt of this submission.

Many thanks,

Josh

Josh Plant
Graduate Planner

Attachment included with response. Please contact to request to view

Respondent Greg Charlton

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

To whom it may concern,

I strongly object to the inclusion of RAD26 and RAD25 as possible areas for housing development in BANES Local Plan:

RAD26

* The land is a Greenfield site, which has been used to productively grow arable crops for at least the last 200 years. It is valuable farmland that produces local food. The Government advises councils to avoid building on agricultural land. There are several Brownfield sites in our area, which should be developed as a priority. Writhlington has already exceeded the quota for new houses with more than 60 built in the last two years.

* The infrastructure will not support such a development with local services such as the doctor and dentist already stretched beyond capacity. Public transport is very poor, and due to the very hilly nature of the area it's inappropriate to suggest people could walk or cycle to work, shop or access local services. A development here would be car dependent as there are few opportunities for work in Writhlington meaning that people would be forced to use their cars.

* The road system will not be able to sustain further pressure generated by another housing development.

The A362 is already a busy road with hidden dips, access to/from a new development and the increased traffic would add significantly to safety concerns. The 5-way junction of Frome Road/Knobsbury Lane/Manor Road/Old Road is dangerously congested and frequently gridlocked, particular at peak times and is extremely hazardous for drivers and pedestrians at peak times and regular traffic collisions occur, despite the newly installed speed camera and the pelican crossing. The safety of the students from the 3 schools, who are forced to navigate it, is already compromised. Additional traffic, generated by another housing development, will only exacerbate the problem. The recent development, Orchid Way, has already added further to congestion here. The rejection of an application by BANES to build 160 houses in Writhlington in 2019 stated that the development would have a 'severe and cumulative effect' on the road system in Radstock.

Some traffic from any development would inevitably use two single-track lanes, Green Parlour/The Coombe and Church Hill, which lead to Bath. These roads lead to a 1.8m wide bridge, with a 3-ton limit and a blind 90-degree bend underneath the railway arch. They are prone to extreme water run-off, and in winter are often dangerously icy, causing accidents. They are excessively used, making it dangerous for walkers, horse riders and cyclists and also provide the nearest access from Writhlington to the cycle way as cycling down the busy A362 without a designated cycle lane is not acceptable.

* The Government, BANES and Radstock Councils have all declared a Climate Emergency. Any housing development must not result in out commuting, with additional vehicles on our roads adding to congestion and pollution.

* There is very strong feeling amongst villagers in Writhlington against further development here. In 2019 over 230 objections were made to BANES protesting a planning application on RAD26.

RAD25

NB All of the above objections apply to RAD25 as well as the below

* The area identified as RAD25 is inaccurate as it includes a Grade 2 listed building, which is privately owned, and the owner has no intention to sell.

* RAD25 has been used for agricultural purposes for years and is used to rear free-range poultry and has beehives producing honey.

* Access to the site would open on to Church Hill or Manor Road. Drivers would undoubtedly turn right out on to Church Hill to take a short cut to the Peasedown bypass driving through the two Conservation areas in Lower Writhlington across the narrow bridge over the Wellow Brook and under the railway arch which is on a blind bend. This development would make safe access to this green space even more hazardous and is approximately 80 metres from the single-track part of Church Hill, which is extremely steep, mostly single track with blind corners. The road is dangerous as it's in poor condition, there's a spring that runs onto it as well as run off from the hills.

Many Thanks

Greg Charlton -

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Guild Living & Legal and General

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good afternoon

Please find attached representations on the Local Plan partial update Commencement Document, prepared by Nexus Planning on behalf of Guild Living & Legal and General.

Please could I request confirmation of receipt of this email. Should you have any questions, please do not hesitate to contact me.

Kind regards

Zena Foale-Banks
Principal Planner

Attachment included with response. Please contact to request to view

Respondent Helen and Steve Gulliford

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

BANES Planning and Banes Councillors,

I would like to register my objections to the inclusion of RAD26 and RAD25 to the BANES Local Plan. During the local consultation of the Local Plan for our area held in the Town Hall at Midsomer Norton many residents from Writhlington viewed the plans and voiced their opinions and concerns to the Planning Officers in attendance. We understood from our Radstock Councillors that when the local Plan was to be complete the area RAD26 would not be included. Since when has this been changed and RAD25 added too. RAD26 is still a Greenfield site. This has not changed and has been farmed by the same farm and local Farmer for many years. It is valuable farmland used to produce crops for food production, (food air miles?) and support jobs for local people. There are Brownfield sites in our area which should be used as a priority in any future developments. I would also like to add that Writhlington has already exceeded its quota for new houses. In 2019 BANES received over 230 objections to a planning application made to BANES for RAD26, this was rejected by BANES. All the reasons for the objections BANES received in 2019 for RAD26 have not changed, but the inclusion of RAD25 will just make the problems of building houses in these areas double. Double the traffic, exit and access from both sites, narrow roads, narrow lanes, lack of public transport, local doctors, libraries, lack of local jobs. Also both Banes and Radstock Town council have adopted a climate emergency plan. Will this be adhered to.

I would like to ask BANES Councillors do you think that this is a fair and wide reaching consultation given the present circumstances in which we all find ourselves. Many will be shielding, or living in lock down, some away from their families, worries of catching Covid 19, lack of money and wages, affording food ,being furlonged, losing jobs, losing loved ones to the coronavirus, grieving and not able to attend funerals, are probably the biggest thoughts for most people and their priority in the present circumstances - not the Big Local Plan as Banes obviously thinks. How many will have access to a computer, not everyone, or ask someone to help given that the most vulnerable groups are shielding or in lock down, some would like to write a letter to Banes, but who will post it or go to the post office for stamps. This leaves many without a voice.

I look forward to BANES to use commonsense.

Kind Regards

Helen and Steve Gulliford.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Highways England

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Planning Policy Team,

Please find attached a copy of Highways England's comments on the above.

Regards,

Chrystèle Garnier-Kusiak

Administrator - Performance Assurance & Business Services Team
Highways England | Brunel House | 930 Hempton Court, Aztec West | Bristol | BS32 4SR

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Hignett Family Trust

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/madam

Please find a response from Hignett Family Trust to the Commencement Document to the Local Plan partial review.

Please acknowledge receipt

Regards

Matthew Macan

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Historic England

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good morning,

please find attached observations from Historic England with regards to the LP Partial Update and associated SA Scoping Report (thank you Karou).

I suspect the implications of this dreadful Virus may well further shape the future version. Keep well.

Sincere regards

Rohan

Rohan Torkildsen BaHons DipUD MRTPI

Partnerships Team Leader South West

Historic Environment Planning Adviser South West

Regions Group

Historic England

Attachment included with response. Please contact to request to view

Respondent hkk1h

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Habinteg has 5 years' experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response therefore focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of Bath and North East Somerset. It's great to see section 13 of the partial update "Facilitating the supply of housing to meet specific needs e.g. including those of older people (potentially through the allocation of sites, revision of the policy approach towards elderly persons housing and reviewing housing accessibility standards)". Habinteg strongly believe that all new homes should meet Building Regulations M4 Category 2 accessible and adaptable standard homes in order to meet the needs of disabled and elderly people in Bath and North East Somerset. With only 7% of English homes having the accessibility features to classify them as 'visitable' it's really important that new homes deliver accessibility and adaptability to help meet the national accessible homes deficit. A Habinteg research report (A forecast for accessible homes) published in the summer of 2019 revealed that in England only 22% of new homes due to be built by 2023 will meet accessible and adaptable standards. Building new homes to meet Part M4(2) accessible and adaptable homes will ensure that access and inclusion is prioritised in the local area. We do not underestimate the benefits of a making a commitment to inclusive design in providing quick and cost-effective adaptations when required. New homes that meet category M4(2) provide a better environment for ongoing independence when needs change, meaning faster hospital discharge and less expenditure on more expensive residential care settings. The provision of a suitably accessible home in a welcoming and inclusively designed neighbourhood can transform the lives of people who are so often left to 'make do' in unsuitable accommodation. Habinteg tenants have told us that having their need for accessible homes met can have wide-ranging positive impacts, from the ability to access their children's rooms to read a bedtime story, to the ability to cook a family meal, and to come and go as they wish to visit family and friends. We also know that disabled people who have their needs for accessible homes met are four times more likely to be in work than those who don't. Habinteg believe that alongside an increased supply of accessible and adaptable homes it is critical that an adequate number of homes are built to Building Regulations M4 Category 3 (wheelchair user dwellings standard). There are 1.2 million wheelchair users in the UK roughly equivalent to 2% of the population. Habinteg's Forecast for Accessible Homes also found that just 1% of homes outside London are set to be built to wheelchair dwelling standards between 2019 and 2023. We would therefore like to see Bath and North East Somerset set a similar requirement for wheelchair user dwellings as that set down in the London Plan which requires that, 1% of new homes comply with Part M4 (3) Standard (the other 9% required to be built to part M4 (2) accessible and adaptable standard). Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 1% requirement of Part M4(3) homes should be considered as a starting point for all local plans with the remaining 9% meeting Part M4(2) accessible and adaptable dwellings. Further information and sources of expertise: 1. Habinteg's in house consultancy Centre for Accessible Environments, (CAE) offer bespoke training and consultancy on all aspects of access including housing, public spaces and community facilities. CAE's services may be of benefit to the Bath and North East Somerset planning department in ensuring housing is delivered to the required M4(2) / M4(3) standards. The team have delivered support to several local authorities as well as statutory bodies such as Homes England, helping to upskill staff in the specific characteristics of accessible housing, as well as providing practical support reviewing development plans and proposals. You can read more on the CAE website at www.CAE.org.uk 2. Housing and Disabled People, a toolkit for local authorities was a joint project of Habinteg and the Equality and Human Rights Commission published in 2018. The chapter on Planning for Accessible Homes provides some useful suggestions for the production of robust planning policy for accessible housing. <https://www.habinteg.org.uk/ehrc> 3. Habinteg's Insight Report: A Forecast for accessible homes assessed accessible housing policy across all local planning authorities in England. You can see read the

full report and headline findings here. <https://www.habinteg.org.uk/localplans/> Please don't hesitate to get in touch with us if we can help in any way. cmcgill@habinteg.org.uk.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Home Builders Federation

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir / Madam

For the Council's consideration please find attached the HBF's response to the above mentioned consultation. If any further information or assistance is required please contact the undersigned.

Yours faithfully

For and on behalf of HBF

Sue Green

Planning Manager – Local Plans

HOME BUILDERS FEDERATION

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Hugh Pemberton

Response Type: Online Form

Do you have any other specific observations to make on the Local Plan Partial Update?

1) The Plan continues to be too focused on (increasingly scarce) brown field redevelopment, relatively reluctant to countenance substantial development in as yet undeveloped space, and almost entirely unwilling to consider compromises around green belt st

Respondent Ian and Lucy Bush

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Morning

I would like to put forward my objections to RAD25 and RAD26

I live in manor road Ba33lu and have done so for many years. I can assure you the road is not capable of handling the increased traffic flow .the busy junction outside the shop is a nightmare already on school days and a danger to all .

There are many brownfield sites available to build on , much more suitable without spoiling are “greenfield” site ..

This submission was booted out by all concerned as not suitable, not 6 months ago , and off we go again , then they try again .

Tell them “the site is not suitable !!!!”

Ian and Lucy bush

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Inspired Villages

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam

I write with response to the consultation on the emerging Local Plan. I write on behalf of Inspired Villages, a developer and operator of retirement communities in the UK. We have six operating villages and a further 13 legally secured (under construction, due to start or in planning) and with a target to have 50 operating villages within the next ten years. We are fully funded by Legal & General. As we focussed on the delivery and growth of the later living sector to ensure the provision of purpose built accommodation for older people, attached are our representations and recommendations (pg17) to assist the shaping of your emerging Local Plan.

We write in response to:-

- * 'comments on the proposed scope and content of the local plan partial update and the policies to be updated'
- * PMP:H1 Housing and facilities for the elderly, people with other supported housing or care needs

I would be grateful to receive confirmation of the receipt of this email and our submissions (pdf attached).

I would be pleased to have a conversation with you and your colleagues to ensure that the emerging Local Plan fully takes into account the ageing demographic and plans positively to meet, in full, the housing needs for older people.

Kind regards
Stuart

Stuart Garnett BSc DipTP MRTPI

Planning Director

Attachment included with response. Please contact to request to view

Respondent Iqbal Hamiduddin

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space (especially to PBSA uses) and to provide opportunities for small

and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Respondent Jackie Osmond

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I strongly object to the inclusion of RAD26 and RAD25 as possible areas for housing development in BANES Local Plan. As a past resident of the area, having lived in Magdalene Road for 13 years up to 2017, I have genuine concerns as to the impact of any such development. It could be said that as I no longer reside in the immediate vicinity, my viewpoint carries little weight but I would disagree with this. As an ex-resident, my concerns are based solely on first-hand experience of the problems that already exist and not on a “not in my back-yard” mentality.

I was a regular car user as there was zero public transport available to get me to my destination. My journey to and from work proved a daily battle to get out of Manor Road onto the main Frome Road with large numbers of vehicles trying to get in and out of Manor Road, Knobsbury Lane and Old Road. With significant numbers of school children arriving/departing, it is no surprise to any of the residents when there is an accident and any increase in traffic will have a negative effect on the safety of both road users and pedestrians.

The addition of the new houses in Orchid Way just made the situation even worse.....and the fact that anyone could consider adding further houses suggests there is a lack of awareness of the real problems that already exist. It is normal for most houses to have at least 2 vehicles, many of them used on a daily basis, and to consider adding a substantial number of vehicles into the already severely congested junction is extremely worrying. The reality is that adding any number of vehicles would apply huge pressure to an already dangerous situation.

Some of the traffic may consider taking the lane through to the Peasedown by-pass to avoid the junction, but that route is also heavily used and totally unsuitable for additional traffic. During periods of heavy rain, the route becomes quite treacherous.

I would implore anyone considering the inclusion of these areas to visit during these very congested times to fully appreciate the difficulties the residents face.

There are insufficient facilities and very little employment in the area to justify another increase in the population. To access retail outlets, surgeries, jobs etc requires residents to use their cars due to the severe lack of alternative transport.

I believe RAD26 is a green field site and both sites are used for arable purposes. Looking to the future, there is an ever-increasing consensus of opinion that we should be moving towards producing more crops/vegetables and it makes little sense to lose arable land when there are brownfield sites within the BANES area still to be developed. Once this arable land is lost to housing development, it will never be regained.

Sadly, it seems once again that little regard is being given for the well being of the existing community. It would surely make more sense for them to develop a brownfield site which would enhance rather than debase that area.

Jackie Osmond

Paulton

Respondent Jade Tipp

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have the following policy suggestions for adoption into the Local Plan Partial Update: 1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space

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Respondent James Docherty

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

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(especially to PBSA uses) and to provide opportunities for small and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed. To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable & key worker housing, housing for the elderly or the protection of non-strategic industrial space. It should also form the basis for enshrining the Bath Building Heights Strategy as Supplementary Planning Guidance.

Question 4. Do you have any comments on the Draft Statement of Community Involvement? Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forward exactly as originally foreseen. Local residents' feedback submitted in response to an application is often ultimately reduced to an unweighted list of bullet points in a case officer's report and then seemingly entirely disregarded. Residents cannot be expected to be familiar with the detail of planning policy or overarching planning strategy, but their feedback should not be automatically discounted on the basis that it is not grounded in specific, numbered policies. Where there is overwhelming opinion in relation to a specific aspect of an application by a significant number or proportion of local residents, either at the pre-application or application stage, case officers should, as far as possible, take the trouble to try to reflect the broad concerns that residents have taken the trouble to feed into the process by invoking policy-based reasoning to properly reflect the public concern, commensurate with the strength of public feeling expressed. As a reminder, the council has as one of its strategic aims "Putting the interests of residents first".

Question 5. Would you like to add an attachment? No

Question 6. If yes, please upload the document here. n/a

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?
No

Do you have any other specific observations to make on the Local Plan Partial Update?

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Respondent James Henderson

Response Type: Online Form

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Do you have any comments on the programme for the preparation of the Local Plan Partial Update?
no

Do you have any other specific observations to make on the Local Plan Partial Update?

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Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Janice Hyde

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

To whom it may concern,

I would like to express my extreme objection to the inclusion of RAD26 and RAD25 as possible areas for housing development in BANES Local Plan

The land marked as RAD26 is a Greenfield site, which has been used to productively grow arable crops for at least the last 200 years. It is valuable farmland that produces local food. The Government advises councils to avoid building on agricultural land. There are several Brownfield sites in our area, which should be developed as a priority. Writhlington has already exceeded the quota for new houses with more than 60 built in the last two years.

The area identified as RAD25 is inaccurate as it includes a Grade 2 listed building, which is privately owned, and the owner has no intention to sell. RAD25 has been used for agricultural purposes for years and is used to rear free-range poultry and has beehives producing honey.

The entrances to these areas would have to be taken from Church Hill and the surrounding roads which are highly populated and would not be fit for purpose. please see link below:

https://www.google.co.uk/maps/@51.2916182,-2.4269977,3a,75y,90h,90t/data=!3m6!1e1!3m4!1s8yLHUI1CwvYbgU_6JMg6HQ!2e0!7i13312!8i6656

is a link to the area, as you continue down the road it becomes a tint country lane where two cars cannot pass each other, added to this issue is the fact that when we have any rainfall the lane becomes a waterfall'

Both Rad25 and RAD26 need to be withdrawn from any future projects as planning permission has been rejected historically.

If I may be of further assistance, please don't hesitate to contact me.

Best regards.

Janice Hyde

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Jeff Evans

Response Type: Email



Attachment included with response. Please contact to request to view

Respondent Jennifer and Shane Prince

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs,

I am writing to express my objection to the possible building of ANY new homes in the Writhlington area.

The areas suggested for the building are both greenfield sites that are currently being farmed upon, whilst there are many brownfield sites locally that have not been utilised in this way. Surely they should be considered ahead of greenfield sites?

In my opinion the roads around here would not be able to sustain the increased traffic from the additional home owners - most of them being in dire condition and prone to flooding and accident hot spots. It is already difficult to use these roads at the best of times and this would make life almost unbearable.

The local services and amenities would not support the additional families that would live there - Gp and dentist already full to capacity. There are also many houses for sale and rent in the area so the need is not there.

I do hope you consider my points and seriously reevaluate the need to disrupt this beautiful area and green space.

Kind regards

Jennifer and Shane Prince

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Jennifer Harper

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

My son wrote to Wera Hobhouse about what is being done in BANES to help residents in terraced housing areas who want to switch to electric cars but who have no private parking available/possible. In para 13b of the Local Plan Partial Update, I want you to be specific about how you will implement green infrastructure to help us switch to sustainable transport - i.e. neighbourhood charging schemes. The OLEV had grants available for LAs to trial these schemes and we have been asking BANES to pilot in our neighbourhood where there is significant will to change to less polluting vehicles if charging infrastructure can be provided.

Respondent Jennifer L Prowse

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

To whom it may concern.

I am writing with my objections to the planned development of RAD25 and RAD26.

We have already fought off a planning application for the area and won due to the following reasons which still apply.

- * Writhlington has met its quota for housing up and 2029 <tel:+442029>
- * the road infrastructure is inadequate for the existing houses so would not support more houses.
- * it is also a accident black spot with frequent collisions over at the last few years. There has also been a couple of school children knocked over on the crossing going to school.
- * the two local schools are oversubscribed so how would more housing and more potential children moving to the area be accommodated
- * employment in the area is very low there for more people would be commuting to outlying towns and cities for work and the bus services round here are practically non-existent
- * drainage and sewerage infrastructure is inadequate as there are frequent floods along the lanes in the surrounding area so makes it impossible to pass some roads and makes Church Lane in particular very icy and dangerous in the winter
- * the fields indicated on the two areas are also green belt agricultural land so is not really usable for housing. And there is a wooded area that has been identified by the council has being a conservation woodland so this housing possible development could damage this area
- * the road access required to these two sites is inadequate and would cause more congestion than there is already
- * there is a wide variety of wildlife in the area that could be severely affected by further development. we have bat's, slow worms, field mice, owls along with many other wild animals that are around these areas
- * writhlington also only has a small shop to serve the whole area and transport links are inadequate to serve more houses with people having to travel to work outside of the area.

And lastly I would just like to say how disappointed I am that you have decided to continue with this planning application in the current pandemic. This has put us all at a disadvantage to gather together and organise proper objections. It shows very poor judgement and lack of respect for the residents at a time when we are all trying to do the right thing to control the situation. Surely it would have been better to wait until all this had passed and we could all gather and object sufficiently.

I would therefore ask the council to consider taking RAD25 and RAD26 out of the plans for housing in the area.

Yours sincerely

Mrs Jennifer L Prowse

Respondent Jennifer Morgan

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

To whom it may concern,

I am writing to you to express these concerns concerning the possibility of development on land off Old Road, Writhlington (RAD25 and RAD26) and hope that you will join me in opposing the development.

The access to and from this site is already very difficult especially at school times. If you then were to add any more homes to the area it would be a nightmare in terms of travelling and in terms of the safety of drivers and pedestrians.

The infrastructure in the area will not sustain this development, especially the drains and roads. The availability of school places and capacity at doctors surgeries would be stretched even further than they already are.

I am also concerned about the detrimental effect development could have on the natural environment. Currently there are many different species of birds and animals in the area including birds of prey, owls, badgers, foxes and slow worms. These would all be put at risk if the developments were to take place on the site.

It is incredibly damaging to build on Greenfield sites such as these. There are Brownfield sites that have not been developed in the Somer Valley. These should be developed before Greenfield sites are even considered.

Writhlington has reached its quota of new housing developments with the homes that were built next to the school. This has satisfied the requirements for the area and should not be furthered.

I thank you for taking the time to read my concerns and hope that you will take them into consideration when making decisions regarding RAD25 and RAD26.

Kind regards,

Jennifer Morgan

██████████
██████████

Respondent Jenny John

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

Since the Core Strategy was formally accepted, 3 major events have taken place which have a huge impact on the future.

1. Brexit
2. COVID 19
3. Climate Emergency

The impact of these events needs to be assessed prior to making any decisions.

What are the new priorities? What are the criteria for concreting over green agricultural land?

An evidence base must be established, setting out up to date housing requirement.

Criteria must be established with the Clean Air Zone/Climate Emergency as a priority.

It must not be allowed to slip back on the agenda: time is not on our side.

Factors which should be taken into account are -

Student numbers - the impact of reduction. Students should live on campus.

Reduced Tourism - decline in need for yet more hotels.

How mental & physical health can be enhanced.

Reassessment of housing need in terms of type and numbers.

Brownfield sites first.

Preserving at all costs the unique qualities of the precious WHS and its Setting.

Transport: must be as Green as it possibly can be. But realistic - Bath's hills are not cycle-friendly.

The Call for Sites should only be necessary if a thorough reassessment of the evidence shows these are necessary. Where is the evidence for the need to revisit areas washed over by the Green Belt? To destroy this protective layer should be a last resort.

Please include me in any further consultations.

Kind regards

Jenny John

B&NES' JSP was rejected by the Examiners because plans were made in the wrong order: sites chosen and then reasons given.

Sent from my iPad

Respondent Jill Reynolds

Response Type: Online Form

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Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Jill Rogers

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Bath & North East Somerset Council

Planning Department

Lewis House

Manvers Street

Bath

BA1 1JG

29th April 2020

Dear Sirs

Objections to Proposed Local Plan

Reference: RAD25 & RAD 26

I live in Writhlington, very close to both proposed development plots and therefore feel very well placed to give an objective assessment on the effect that increased housing development will have on this community. We run a small business from home selling bird food and therefore know many local people from the whole area surrounding Writhlington and have had an opportunity to discuss these issues with them as well.

In the last few years, Manor Road itself has seen an incredibly significant increase in traffic which relates to the new houses on the corner site of Knobsbury Lane to a degree but also to the Dragonfly Leisure Centre at the site of the old Writhlington School. Manor Road and Church Hill are often used by people travelling from the direction of Peasedown St John as a cut through, instead of going down the main road into Radstock, which can be very congested, especially at peak times. Traffic is also due to journeys being made to the two schools in Writhlington and also to people making onward journeys straight across the main road at the crossroads and going on to Kilmersdon and to the A37 en route to Shepton Mallet and Chilcompton.

Manor Road is a residential street with a 20mph restriction. You would often never believe this to be the case as some people alarmingly and regularly exceed this speed limit. There are houses on both sides of the road and parked cars on one side, the possibility of a child or animal stepping out under the path of this fast moving traffic is ever present. The traffic situation is one of the main reasons for my objection to any additional housing, particularly on the scale which would be likely to be developed on one, or even worse, both these parcels of land. As already indicated traffic in Manor Road would be incredibly increased. Furthermore traffic coming from these houses and turning right down Church Hill and down the steep windy country lane past the old Writhlington Church (for a long time a house) and joining the road at the bottom which then leads on towards Peasedown, has to negotiate a single track bridge over a stream with an low overhead bridge which is now the cycle track. This particular obstacle regularly causes the lane in both directions to be blocked since lorries, probably through the use of SatNavs attempt to take that route and cannot get under the bridge. It is nothing to be stuck there for half an hour, unable to reverse or move forward just waiting for the obstruction to be cleared. The road is simply not fit for purpose for the traffic that presently uses it and the idea of the amount of additional cars that would traverse that route causing more chaos and possible accidents is appalling. There have been many recorded accidents on the roads in this village and the nearby lanes. The crossroads at the top of Manor Road, despite having a speed camera installed is still not free of accidents, it is not just traffic passing through the speed camera's gaze that cause accidents but the crossing of the main road from Manor Road to Knobsbury Lane that is very dangerous too. There are two schools situated in this area and therefore at peak times many cars trying to get across as well as children and parents walking, at present it is dangerous and difficult, more houses will make it much worse.

I walk my dog down these lanes every day of the week and have many times seen the problems that occur in the increased use of these roads. During the winter months the roads become more treacherous with ice – there are springs running down the hilly areas that easily turn to ice when the temperature dips. No gritters can access these lanes and yet traffic still use them. Many times I have seen cars in the hedge, especially at the bottom of the hill by the old church, it is lethal as, if cars are passing in opposite direction one has to drive onto the ice and breaking is essential because of the gradient and useless as the cars will not hold the road! Very scary. The other peril is excess water, which has got worse from housing development and loss of grass in front gardens, the water is driven onto the roads along with debris. The drains in the lanes cannot cope, the bend just before the junction with the Foxcote road regularly lifts and can be very dangerous indeed when it is flooded. More houses will cause more delays and the chance for more accidents. I was involved in an accident two years ago. The traffic was standing still because of the difficulty of passing traffic on the hill up towards the poultry farm situated on the corner just before the Braysdown Lane turn. Every time one car managed to get through the queue moved along a bit further. Unfortunately I was on a bend and had moved forward but the car coming behind me did not realise that beyond that bend I had had to stop again to wait and he hit the back of my car. Luckily, I was not injured apart from a jarring of my neck, it could have been a lot worse but this is the type of incident which is commonplace because the road simply cannot cope with the number of vehicles using it. This is without increased traffic.

The proposed fields are presently designated as Greenfield sites and are both being productively farmed. Farmland should not be built on, we live in an overpopulated country whose reliance on imported goods is well known, we need to come more self-sustaining not less. The land should continue to be used to produce food to feed the people of this country.

The local facilities are not their best. The public transport is poor, commuters cannot use it to get to Bristol, Frome or Bath to go to work. There is very little in the way of large employers in this local area, therefore the increase of traffic being forced to travel out of Writhlington will increase, especially at peak times. If you walk up the main road from Radstock to Writhlington during peak times you can taste the pollution, that is how bad it is. Children use this road to walk to school from the houses that are local to the schools, this type of pollution is known to have a detrimental effect on children in particular. Because of the geographical situation of this particular area to suggest that older people can walk into Radstock to be able

access the shops or the doctors surgery is ridiculous it is far too hilly for any but the fittest people to attempt.

The services such as doctor and dentist surgeries in this area are already overstretched more demand will make it even harder to get an appointment.

Over the last few years in excess of 60 new houses have been built in Writhlington that has already placed a huge amount of pressure on our infrastructure.

The countryside around this village is beautiful with many wild plants and a large variety of wildlife. There is much history from the mining heritage which can be seen in the fields and footpaths. This history should be preserved for future generations and not built on.

Within the locality there are Brownfield sites that have not been developed. These should be developed before Greenfield sites are even considered. In Midsomer Norton and Welton there is the large factory site which was originally Welton Bag and other smaller industries that is now empty and looking like a real eyesore – hardly an attraction to the town when encouraging people to use their high streets. This should be built on not on beautiful farming land outside the housing boundary.

I would therefore urge planning officers to seriously consider any change of use of these two sites, come and look for themselves to see the impracticalities of housing development here. I would be pleased to give you a tour, showing all the areas that I have detailed, my dog would enjoy meeting you!

Yours faithfully

Jill Rogers

Respondent Jill Shaw

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I wish to object to RAD25 and RAD26 as potential housing sites on the new Local Plan.

They are both productively farmed, RAD25 has a poultry farm and bee hive in the lower half and RAD26 has been arable farm land for over 200 years, providing a local farmer with very valuable income. BANES Green Infrastructure Strategy says a priority is 'increasing opportunities for local food production'. Losing agricultural land is not acceptable.

The top half of RAD25 contains a variety of trees including alder, red chestnut, ash, purple beech and eucalyptus. It is a haven for slow worms, grass snakes, hedgehogs and other wildlife. Both RAD25 and RAD26 support a large bat population including horseshoe bats. BANES Green Infrastructure strategy states we must 'protect and enhance biodiversity' and 'conserve and enhance the natural environment'. Both these fields are the 'soft' places on the edge of the Radstock built up area, these natural habitats and beautiful landscapes quietly control the background to our health and wellbeing.

We need to put 'the value of nature at the heart of decision making' and 'protect all notable trees'. 'The distinctive character of the countryside surrounding towns and villages will be protected'. These sites are on the edge of Writhlington village and must be preserved.

The Government and BANES Council have announced a 'Climate Emergency' which must be the highest priority for making any future plans. We must minimise out commuting and reduce the number of cars on the road. People in Writhlington are all car dependent as there is very limited public transport which is certainly not suitable for commuters and no facilities apart from a small corner shop and a privately owned village hall. There is minimal employment here and even the new proposed Somer Valley Enterprise Zone has no sites in this area. The doctor and dentist surgeries which are oversubscribed are in Radstock down the steep and busy A362, a sick person would be unable to walk this on foot.

Climate Emergency measures include walking and cycling to work, again the hilly terrain negates this and access to the Green Infrastructure is down very steep narrow lanes with blind bends and no pavements. Both RAD25 and RAD26 would not provide housing that fulfils the Climate Emergency requirements.

Access to both these sites would be via already congested or unsuitable roads. The 5-way junction of Frome Rd, Knobsbury Lane and Manor Road is grid locked at peak times and has to be navigated by the children attending the three local schools. Even though there is a pelican crossing there have been accidents involving school children on several occasions.

Adding further cars here without a traffic light system would be unacceptable.

The A362 leads down to Radstock town centre and is also heavily congested during rush hour, this problem has been exacerbated by the new shopping area containing Proper Job and Subway. Cars queue to get in and out of the car park. This adds to air pollution from traffic fumes.

To avoid Radstock centre, drivers use the narrow country lanes to get to the Peasedown bypass. These have poor visibility and surface quality, blind bends, a narrow bridge and constant water run-off in the winter. These lanes are already unsuitable for the level of traffic currently using them and horse riders, cyclists and pedestrians are unable to utilize them, they need pavements and the bridge at the bottom needs widening or traffic lights installing.

BANES Core Strategy states that there is no immediate prospect of large-scale funding to trigger road infrastructure improvements within the plan period

Last year a planning application was submitted for RAD26 (18/05683/OUT). It was refused. BANES Landscape, Highways, Archaeology and Planning objected as did 234 members of the public If the

application was refused surely this means this site is unsuitable?
RAD25 has all the same objections as RAD26 so should also be unsuitable.

Water run-off is a significant problem in this area due to natural springs and since the building of Orchid Way on Knobsbury Lane there is significant local flooding during the winter months. Adding more houses would exacerbate these problems.

Potential housing sites need to be near good transport links, employment, medical and retail facilities. Residents must be able to walk, cycle or take public transport so that we reduce our carbon footprint and protect the future. RAD25 and RAD26 do not fulfil these criteria and must be removed from the Plan.

Respondent Joanna Bowden

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have the following policy suggestions for adoption into the Local Plan Partial Update: 1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space

(especially to PBSA uses) and to provide opportunities for small and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Respondent Joe Scofield

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

The document is very technically worded and I do not claim to be au fait with the whole subject. The recent application by Bath City Football Club to develop the Twerton Park football ground site highlights some key issues relating to the development of Bath. One of the four main objections that planners raised against the proposal for Twerton Park, was that the scheme very much failed to respect the Twerton Conservation Area. With this in mind, it would make sense to include the protection of Conservation Areas among the topics requiring evidence-based review listed on page 12 of the document. For example, there could be specific policies addressing the height, massing and quality of proposed structures in Conservation Areas that feature low-lying historic buildings. This would strengthen the case against such inappropriate builds, both at the planning committee and if the application happens to go to Appeal. It was noticeable that the existing policy SB14 covering the development of Twerton did not protect the area from a proposed inappropriate mix of student accommodation relative to the low levels and poor quality of affordable housing in the football club's plans. The case of Twerton and this application should be used as evidence to inform new policies protecting potential housing land, as well as policies to limit student accommodation in the city. Strategies such as SB14 should contain more details to protect areas from bad builds. Another aim could be to discourage the duplication of facilities. In the case of Twerton, the above application argued that the construction of new community facilities outweighed the negative impacts of the plans. However, as Councillor Moore observed in her speech to the planning committee, most of these benefits could already be found in the surrounding area. The scope of the update should include measures to encourage the development of genuinely new facilities and discourage the duplication of things that already exist. Developers should have to do more to show that what is planned is truly novel and needed in an area. I feel that the council should tighten and assert its requirement that developments contain the specified percentage of affordable housing. This would prompt the value of the land to drop accordingly, increasing the scope for developers to include such housing within viability considerations.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

The timeline looks painfully slow and will result in further despairing cries from the public to correct the balance between student blocks and affordable housing.

Respondent Joel Staley

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I am writing to object to the proposal for further development of housing on two sites in Writhlington, Radstock: RAD25 and RAD26

These are greenfield sites being productively farmed and are outside the housing development boundary.

The roads surrounding these sites are busy already. Increases in traffic on these narrow country lanes, as well as the 5-way junction onto Frome Road, will endanger the lives of locals and school children even more than currently. Lanes from Peasedown and Bath are single track, narrow and steep, have weight restrictions and are prone to flooding, which damages the road surface, and in winter are often dangerously icy.

As a parent with a child at the local primary school, St Mary's, as well as a frequent runner, cyclist and walker in the area, I am already increasingly concerned about my family's safety. Without any plans to improve the local road network it would be exceptionally dangerous to add more load to this situation.

Public transport links are poor, with most residents reliant on cars to travel to work, as well as to access local shops and other services. Cycling or walking to access services is not possible for a great number of people. I live in Writhlington, but work in Bath, and my hours of work coupled with childcare arrangements make it impossible for me to use public transport with any regularity. Having declared a Climate Emergency, this is exactly the kind of development B&NES should be discouraging as it will add to local congestion and pollution.

60 new houses have already been built in the village in the past 3 years, placing significant pressure on local infrastructure. The quota set by B&NES for this area to 2029 has been met by this previous development, and therefore no further development should take place.

Due to these reasons and many others, RAD25 and RAD26 should be removed from the B&NES plan on the grounds that they are hugely unsuitable for any further development.

Best wishes

Joel Staley

Respondent John Branston

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have the following policy suggestions for adoption into the Local Plan Partial Update:

- [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure).
- [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance:
 - No purpose-built student accommodation will be permitted;
 - No purpose-built high-density co-living accommodation will be permitted;
 - Existing HMOs may not expand/increase their current permitted capacity.
- [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed.
- [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants.
- [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants.
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- [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose.
- [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year').
-

PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space (especially to PBSA uses) and to provide opportunities for small and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forward exactl

Respondent John Diver

Response Type: Online Form

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Do you have any comments on the programme for the preparation of the Local Plan Partial Update?
None

Do you have any other specific observations to make on the Local Plan Partial Update?

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Respondent John Hicks

Response Type: Online Form

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Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent john roberts

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

arable land and green belt must not be built on while numerous brown field sites in B&NES are being ignored.

Do you have any other specific observations to make on the Local Plan Partial Update?

proposed development of numerous houses in the village of writhlington on two sites will cause major problems, massive increase in local traffic on our narrow and congested village roads. local small communities do not have the infrastructure to support

Respondent John Whittock

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir

I strongly object to the inclusion of RAD26 and RAD25 as possible areas for housing development in BANES Local Plan for the following reasons:

- The land is a Greenfield site, which has been used to productively grow arable crops for at least the last 200 years. It is valuable farmland that produces local food. The Government advises councils to avoid building on agricultural land. There are several Brownfield sites in our area, which should be developed as a priority. Writhlington has already exceeded the quota for new houses with more than 60 built in the last two years.
- RAD26 offers provides open space, strengthens existing landscape features and views to the open landscape. This field is also a vital habitat for a number of species as recorded by local residents. Writhlington is an area rich in history, flora and fauna; this historic and natural environment needs to be preserved for future generations.
- The infrastructure will not support such a development with local services such as the doctor and dentist already stretched beyond capacity. Public transport is very poor, and due to the very hilly nature of the area it's inappropriate to suggest people could walk or cycle to work, shop or access local services. A development here would be car dependent as there are few opportunities for work in Writhlington meaning that people would be forced to use their cars.
- The road system will not be able to sustain further pressure generated by another housing development.

The A362 is already a busy road with hidden dips, access to/from a new development and the increased traffic would add significantly to safety concerns. The 5-way junction of Frome Road/Knobsbury Lane/Manor Road/Old Road is dangerously congested and frequently gridlocked, particular at peak times and is extremely hazardous for drivers and pedestrians at peak times and regular traffic collisions occur, despite the newly installed speed camera and the pelican crossing. The safety of the students from the 3 schools, who are forced to navigate it, is already compromised. Additional traffic, generated by another housing development, will only exacerbate the problem. The recent development, Orchid Way, has already added further to congestion here. The rejection of an application by BANES to build 160 houses in Writhlington in 2019 stated that the development would have a 'severe and cumulative effect' on the road system in Radstock.

Some traffic from any development would inevitably use two single-track lanes, Green Parlour/The Coombe and Church Hill, which lead to Bath. These roads lead to a 1.8m wide bridge, with a 3-ton limit and a blind 90-degree bend underneath the railway arch. They are prone to extreme water run-off, and in winter are often dangerously icy, causing accidents. They are excessively used, making it dangerous for walkers, horse riders and cyclists and also provide the nearest access from Writhlington to the cycle way as cycling down the busy A362 without a designated cycle lane is not acceptable.

- The Government, BANES and Radstock Councils have all declared a Climate Emergency. Any housing development must not result in out commuting, with additional vehicles on our roads adding to congestion and pollution.

- There is very strong feeling amongst villagers in Writhlington against further development here. In 2019 over 230 objections were made to BANES protesting a planning application on RAD26.

RAD25

NB All of the above objections apply to RAD25 as well as the below

- The area identified as RAD25 is inaccurate as it includes a Grade 2 listed building, which is privately owned, and the owner has no intention to sell.

- RAD25 has been used for agricultural purposes for years and is used to rear free-range poultry and has beehives producing honey.

- A development of the site would be very visible from the valley and would be detrimental to the landscape and visual character of the area.

- Access to the site would open on to Church Hill or Manor Road. Drivers would undoubtedly turn right out on to Church Hill to take a short cut to the Peasedown bypass driving through the two Conservation areas in Lower Writhlington across the narrow bridge over the Wellow Brook and under the railway arch which is on a blind bend. This development would make safe access to this green space even more hazardous and is approximately 80 metres from the single-track part of Church Hill, which is extremely steep, mostly single track with blind corners. The road is dangerous as it's in poor condition, there's a spring that runs onto it as well as run off from the hills.

- This site supports a wide range of wildlife, such as bats, deer, slow worms, hedgehogs as well as a huge variety of birds, which would undoubtedly be adversely affected by this development.

- RAD25 and the immediate area surrounding and near it are rich in history with The Monmouth Stone, a Standing Stone registered by The South West heritage Trust on its boundary with Church Hill, an ancient Lime Kiln in an adjacent field as well as two Grade 2 listed buildings adjacent to it. There are further listed buildings in the Conservation Area at the bottom of Church Hill as well as the site of Writhlington Manor, which has links to George Washington. The Batch at the site of Lower Writhlington Colliery is well known for being a rich source of fossils.

Regards

John Whittock

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Johnstone Land (South West) Limited

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

We agree that the Council are going to look at Policies RA1 and RA2 in the Placemaking Plan as more housing needs to be allocated in the Local Plan.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

We think that the timescale is too long although appreciate that the consultation periods always take longer than first estimated.

Do you have any other specific observations to make on the Local Plan Partial Update?

We agree that Policy SR15 in the Placemaking Plan needs to be looked at again. As a purchaser of the land in conjunction with a Housing Association, we would like to see a substantially larger allocation in the Partial Update. This would also include the

What are your views on the new Draft Statement of Community Involvement?

No

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Josephine McCameron-Geeson

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir

Please see attached my objection to the proposals outlined for housing development in BANES Local Plan

Yours faithfully

Josephine McCameron-Geeson

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Julie Jones

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

No

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

We are awaiting to hear if our Housing Development Boundary can be moved from the front of our house to the back of our house. This will enable us to progress with a planning application for the building of a three bed-room house on a plot of land next to

Do you have any other specific observations to make on the Local Plan Partial Update?

No

What are your views on the new Draft Statement of Community Involvement?

No

Respondent Julie Jones 01

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have just received an email from BANES regarding the above.

Whilst I have responded to the 'response' prompt included in the document, in the absence of a notice of receipt, I am reiterating my query to you.

We were in communication over 12 months ago regarding the relocation of the Building Development Boundary adjacent to North View, Peasedown St. John, this matter was included in your subsequent documentation.

If I have interpreted the current document correctly, no reference is made to the request I raised, if this is the case no explanation has been given for the reasons for such rejection - if this is the case I would expect some form of explanation for the reasoning behind this action.

If, however, the latest issued document is issued for comment, my comment is that the previous request should be reinstated.

I would appreciate receipt of your advice..

Regards,

Barrie.

Respondent Julie Jones 02

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Ref: planning proposal at 2 North View, Peasedown St John

We have been in contact with yourself because the Housing Development Boundary runs up one side of our property, which means our house (despite being here since 1908), is outside the HDB.

In previous correspondence, you said that any changes were wrapped up in the Local Plan.

Now that BANES are no longer involved with the South West planning strategy, it seems that you are hoping to have the BANES plan adopted in 2022.

I am writing to request that the Local Authority look at the changing of our HDB outside of the Local Plan, as waiting such a long time for such a small amendment seems unnecessary.

I look forward to a favourable response.

Kind regards,

Julie Jones and Claire Chantler

Respondent Julie Rowe

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good morning

I wish to log my objections to RAD25 and RAD 26 on the Local Plan for the following reasons:-

1. Writhlington cannot sustain any further traffic on its already very pressurised road system. Currently the traffic congestion at the 5 way junction alone puts the lives of children from the 3 schools at risk. Queues of traffic already stretch from the new roundabout in Radstock up beyond the new houses on Orchid Way and often block the 5 way junction totally.
2. Further traffic will have an adverse effect on the current traffic load on the traffic system in Radstock. Again we see queues on all sides of the double roundabouts stretching for $\frac{3}{4}$ mile and more in all directions.
3. Traffic from any further development in Writhlington would inevitably use the very narrow single track lanes that lead to Peasedown St John and then to Bath. These two lanes lead to a 3T weight restriction over a very narrow bridge and then a blind 90deg bend underneath the railway arch. The are often flooded and in winter are treacherously icy. Not only that but the number of lorries etc that exceed the restrictions are constantly getting stuck and blocking the lanes for hours on end until the Police etc manage to get them reversed and out of the way. This also happens on Church Hill near St Marys Rise, and means the estate entrance is often blocked. This could have dire consequences if emergency vehicles could not get onto the estate at any time.
4. The two sites RAD 25 and RAd 26 are both productive farm land. Which should not be built on.
5. The sites provide open spaces, strengthens the existing landscape features and views to the open landscape.
6. These areas have proved crucial during this time of lockdown – being used by the local people as places of exercise and fresh air. In light of this alone these areas should be left as they are.
7. The Government, BANES and Radstock Town Council have all declared a Climate Emergency. Therefore any housing development should not result in out commuting, with additional vehicles on our roads adding to congestion and pollution. We should be reducing not increasing traffic on our roads.
8. The infrastructure will not support such a development. It is already difficult to get doctors appointments with the surgeries being overloaded, and trying to get a dentist is next to impossible. Public transport is extremely poor, and with a population in Writhlington which is either elderly or young families – a lot on low incomes – and due to the hilly nature of the area it is inappropriate and totally wrong to expect people to walk or cycle to work, shop or access local services. The schools are vastly over subscribed too, which just puts added pressure on parents who may have to visit two schools twice a day in order for their children to be educated.
9. The 60 + new houses built in Writhlington over the past 3 years have already had a significant pressure on the already crumbling infrastructure.

10. In the area there are many houses for sale or rent, including many new houses that have not sold. Even the rental properties are out of the reach of young families here who want a home of their own, and with BANES homing people from Bath out here instead of locals who want and need to stay in the area, and need support from their families.

11. Even with sustainable drainage there will be significant run off water with additional houses. The local fields on the side of the road are often inches deep in water all year round.

12. There are plenty of brown field sites that have not been developed in the Somer Valley – these should be developed first, before any green field sites are even considered.

13. Social housing is needed desperately, in the greater Writhlington, Radstock, Westfield and Midsomer Norton area that should firstly be offered to local people on the housing list.

14. Even walking your children to school is dangerous – Manor Road gets so congested that you cannot even walk along the pavements safely – cars drive along the pavements to get to the junction due to the queues of cars dropping children off at the 3 schools. On several occasions I and my granddaughter were lucky not to have been hit by cars driving on the pavement.

15. There is no Lolly Pop personnel at the 5 way junction any more. This adds to the traffic chaos and the danger to children.

16. Writhlington is an area rich in history, flora and fauna. This historic and natural environment needs to be preserved for future generations. Objections to the previous Gladman plan have already been lodged by BANES Archaeology, BANES Highways, BANES planning and BANES Landscape all objected.

As someone who, with my family has lived on St. Marys Rise for 34 years and have seen at first hand how the traffic has increased exponentially, how the lorries continue to ignore weight and height restrictions and blindly follow their satnavs thereby causing chaos and danger down the narrow lanes, how the schools are so over subscribed, have tried to get an NHS dentist without success for 10 years when our private one in Bath closed down, cannot get a regular bus down into Radstock or to Paulton Hospital, and can see how the population is divided between aging people and young families, most on low income, how there is no social housing and what there is seems to be given to people from Bath who then want to move back but took what they were offered as it was a new build. I really cannot understand how these two new developments can be seen to be thought to be feasible.

Mrs Julie Rowe

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Kate Doliczny

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I'm writing, yet again to totally object to the proposed development on the above 2 sites

Firstly the road system currently is totally inadequate for the amount of cars in this area and during the current lock down, manor road is being used more as a racing circuit with cars doing speeds well over 20-50 mph

How lovely it has been to not have to queue to get out of my parked space or to have to wait for 10 mins to get out onto the main road!

Secondly the public transport is almost non-existent here! Under normal circumstances I have to drive 2 teenagers into Bath as there are NO buses to take them from Writhlington at a reasonable time

Thirdly- WHY would 2 greenfield sites be needed to build on when there are adequate brownfield sites that can be developed first!!! We have already exceeded our building quota by 60 and some are still empty!!

Why do we need anymore!!!

Sent from my iPhone

Respondent Katherine Cooke

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I strongly object to RAD25 and RAD26 being included in the partial update of the Plan for Housing Development for the following reasons:

Writhlington, our village, has already exceeded its quota of new houses until 2029.

RAD25 and RAD26 are outside the Housing Development Boundary.

The road infrastructure is already overloaded and dangerous.

RAD25 and RAD26 are greenfield sites.

There is minimal employment in Writhlington so new houses means people commuting out of the area to work, therefore even more traffic on our roads.

There is no drainage or sewage infrastructure near either site.

There are protected species habitats on both sites.

Writhlington has almost non-existent public transport.

There are no social amenities for people.

Housing needs to be built on brownfield sites where there is an existing infrastructure of good roads, drainage and public sewers. Also with strong transport links and plenty of amenities, both medical and social. This is not RAD25 or RAD26.

Katherine Cooke (Mrs)

Respondent Katie Beck

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good evening,

I am emailing you today regarding the local plan in particular two proposed sites RAD25 & RAD26.

As you are fully aware Gladmans proposal was denied for many reasons as the land was deemed unsuitable so why is it still shown on the local plan? Isn't it still unsuitable and going forward will always be unsuitable?

The lanes that surround the proposed land can not take the increase in vehicles that will of course arise if the village size is increased, and may I just highlight that Writhlington is a village!!

During these difficult times it has been a real saviour for many people to be able to walk around the village, using the lanes, and we are all aware how important it is to be outside for not only our physical but mental health. If the amount of vehicles increase it will not be safe for people to use the lanes.

There has already been so many accidents on the roads around the village, it is also extremely congested around the start and end of school, you only have to drive down Frome Hill to see the implications with some days, traffic in Radstock queuing to join the traffic on the hill.

I went to the primary school, St Mary's and can remember looking across the fields looking at the wildlife and watching the farmer and can't imagine children staring out there and looking on to the backs of houses and breathing in fumes.

I have lived in the village for 26 years and would like to think I could bring up my children in this village, enjoying the countryside and walking along the lanes in a safe environment.

In the winter we have various areas in the village that flood, with a decrease of arable land, this is only going to get worse.

We have completed our quota on houses, you only need to look at the amount of new dwellings in Radstock and surrounding areas that have been built over the last couple of years.

Please take the two proposed sights off the local plan, I appreciate you have pressure to build houses but please think of the implications, RAD25 & RAD26 ARE unsuitable!

Kind regards,

Katie

Respondent Keith Tyrrell

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I strongly object to the inclusion of Rad 25 and Rad 26 as possible areas for development in the recently published BANES Local Plan.

A recent planning application for housing development on these two sites proposed by Gladmans, was rejected on several major reasons, including a severe lack of infrastructure together with an unsuitable and dangerous road structure.

In addition to over two hundred and thirty objections from local residents, commenting on the unsuitability and destruction of Writhlington, objections were received from BANES Archeology, Highways, Planning and Landscape departments, confirming the numerous valid objections raised.

Since the inappropriate application from Gladmans within the last two years, no improvements or changes have been made in Writhlington to accommodate any further housing development.

On that basis, I implore you to refer to the recent detailed objections, not only from BANES departments mentioned, but also from the local residents, who have very informative knowledge of these greenfield sites, together with the problems any further housing developments would cause.

Keith Tyrrell

Respondent Kevin Jukes

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam

I strongly object to the proposed development of Rad25 and Rad26 in Writhlington. My reasons for objection are as Follows:-

- 1) The local services such as Doctors and Dentists are already stretched beyond capacity.
- 2) The Road System is already strained with additional traffic from the 60 new House's built over the last 3 years. Increased traffic from further development will have a great impact on traffic congestion especially at the five-way junction putting the safety of the children attending local schools at significant risk.
- 3) The 2 single track lanes that would serve the proposed development are far from suitable for additional traffic as they lead to a narrow bridge with weight restrictions and a blind bend under a railway arch. These lanes are notorious for accidents and are prone to extreme water run-off which in winter in winter renders them dangerously icy.
- 4) The proposed sites are Greenfield and productively Farmed so should not be considered. There are Alternative Brownfield sites that have not been developed in the Somer Valley which should be considered.
- 5) Public transport from Writhlington to local towns and cities is poor, commuters will be forced to use their own transport increasing traffic congestion and pollution at a time when Banes and Radstock councils are under pressure to reduce their Carbon Footprint.
- 6) The proposed sites will have a devastating effect on wildlife, flora and fauna some of which are protected.

Yours Sincerely

Kevin Jukes

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Kilmersdon Estate

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir / Madam

Please find attached our written reps to the Local Plan consultation. I did submit this yesterday, but this morning received a bounce back email.

Attachment included with response. Please contact to request to view

Respondent Kimberley Russell

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have the following policy suggestions for adoption into the Local Plan Partial Update: 1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space

(especially to PBSA uses) and to provide opportunities for small and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Kingswood School

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir or Madam

Please find attached representation to the Local Plan update Commencement Documents on behalf of my client, Kingswood School.

I'd be grateful if you would confirm receipt.

Kind regards

Charlotte

Charlotte Taylor-Drake

Associate Director

Planning, Development and Regeneration

Avison Young

Attachment included with response. Please contact to request to view

Respondent land owners at Keynsham

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Do you have any comments on the proposed scope and content of the Local Plan Partial Update and the policies to be updated as set out in the commencement document and separate policies review table?

The Council is, quite rightly, progressing to review its existing development plan documents, following the abandonment of the JSP process. As part of that process, the council were preparing a revised Local Plan and much work from the council and others went into those documents. The JSP reached examination stage and the emerging Local plan was subject of consultation, at commencement, in 2016 and a further options consultation at the end of 2018.

Over this time, a significant amount of work was undertaken and it is unfortunate that the lack of a single strategy for the JSP document resulted in its demise.

Moving forward, it was hoped that the full review of the Local Plan could progress. However, given the uncertainties over the future of strategic planning in the West of England (WoE) and given the need to have an up to date plan in place, it is understandable that the council has progressed with a Partial Review and we support the council in that decision.

The Partial Review will retain the overall strategy and approach of the Core Strategy and subsequent Place Making Plan, which focused development on sustainable locations, with Bath and then Keynsham at the top of that hierarchy of settlements. This approach is supported and should be retained going forward, in order to meet the council (and governments) objectives of addressing the climate emergency.

However, the expediency of making short term decisions and resolving short term housing land supply questions should not override making the best long term decisions for the location and type of development. The identification of development now, just because it is available, is not necessarily going to result in long term, sustainable, development. Rather the council should be locating development in the right sustainable locations, for the long term, based on good evidence. Such evidence was provided to the JSP and Local Plan processes in regard of land at North Keynsham, which was identified in the JSP as a Strategic Development Location (SDL).

We represent the owners of over 200 acres of land which is part of the North Keynsham SDL and we can confirm that we continue to support the Council in the allocation of this land for development, in what is a highly sustainable location. The land is well located to the A4, which is a significant public transport route and one which will be enhanced in the future through further investment in mass transit between Bristol and Bath. It is also well location in close proximity to a range of services and facilities, as well as Keynsham Railway Station. The allocation of the land in the next iteration of the development plan has received significant support through the previous JSP and Local plan consultations and it is considered imperative that it be identified within the council's review of the plan, in order to provide certainty going forward and to support the significant investment that will be required in order to bring forward the land as part of a sustainable extension to the town.

All plan making should, in line with NPPF, address long term needs and consider the future for the district, by making decision which provide for development in the most sustainable development locations. This must, in the case of B&NES, include considering release of Green Belt as part of that process. This approach is already adopted in the Core Strategy, policy DW1, and much of the evidence needed for such a release at North Keynsham has already been produced and debated as part of the JSP and previous Local Plan processes. Though the JSP has been abandoned, the evidence remains valid.

Therefore, we consider that, even within the context of a Partial Review, the council shouldn't constrain itself to short term opportunist thinking at the detriment of achieving a long term sustainable distribution of development.

With regard to the Policies Review table produced in parallel with the commencement document,
Strategic Policies: DW1, RA1, RA2

It is agreed that a Partial Review should continue to deliver the overall strategy for development, as originally set out in the Core Strategy and that the strategy set out in Policy DW1 remains robust – focusing development in most sustainable locations, which are identified to be Bath then Keynsham.

However, the implication of the policy table is that the allocation of additional land will be subject to RA1 and RA2 policies, so not within these settlements but dispersed to other settlements in the district. It may be a consequence of the approach taken to presentation of the material, but this cannot be the appropriate approach for any review.

The council, through its plan, should focus growth in sustainable locations and this should mean that this is land at Bath and then Keynsham.

At Keynsham Policy DW1 provides for release of Green Belt and this should be a consideration of any future review, in order that the most sustainable locations for growth can be identified.

In addition, if there is to be a Partial Review, the housing numbers identified in Policy DW1 should be considered in the context of the Duty to Co-operate and the need to meet not just housing need in B&NES but also any unmet need from neighbouring authorities, notably Bristol. This need should be accounted for in any consideration of overall housing and employment land need.

2. Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

The current programme indicates that a Partial Review may be adopted in mid-2022. This made certain assumptions at the time of drafting on the basis of the JSP abandonment and the lack of certainty on any revised strategic plan.

It is now understood that a Strategic Development Strategy (SDS) will progress in the coming months and the WECA meeting in June is, we understand, to consider a programme for the preparation of that plan. At the end of April, South Gloucestershire Council issued its local plan programme, which provided for a full review of their plan, in parallel with a SDS. This suggests that a full review of their local plan might be adopted by the end of 2023, having followed the process for the SDS.

If it does become clear that a SDS is to come forward more rapidly than it was originally envisaged, then it may be appropriate for B&NES to consider a revision to their approach and to engage in a full review. This could be undertaken in parallel with the SDS, as was proposed with the previous local plan and should, in principle, result in a programme similar to that which South Gloucestershire have set out.

This would have the benefit of being able to accommodate up to date housing and employment land needs, as well as enabling a greater discussion of strategic opportunities.

There would, undoubtedly, be some delay as a result of the alliance with the SDS. However, if that delay were only limited, then this would be a preferable approach, given the long term benefits of delivering an up to date plan which meets the long term needs of the district.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Lansdown Grange Farm, Bath 01

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Local Plan Team

Further to your Notification below, please find enclosed a suitable Representation in respect of land at Lansdown Grange Farm, Weston, Bath, BA1 4DS.

(There are a number of attachments included with this Representation. To ease receipt I'll issue these by several emails and confirm when the last one is being issued).

At this stage I would be grateful just for an acknowledgement of receipt.

Many thanks

Chris Dance

Associate

LPC (Trull) Ltd

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Lansdown Grange Farm, Bath 02

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Additional Information

Chris Dance

Associate

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From: Chris Dance

Sent: 11 May 2020 14:47

To: 'local_plan2@bathnes.gov.uk' <local_plan2@bathnes.gov.uk>

Subject: RE: Local Plan Partial Update and Draft Statement of Community Involvement - Representation in respect of Lansdown Grange Farm, Weston, Bath, BA1 4DS

Dear Local Plan Team

Further to your Notification below, please find enclosed a suitable Representation in respect of land at Lansdown Grange Farm, Weston, Bath, BA1 4DS.

(There are a number of attachments included with this Representation. To ease receipt I'll issue these by several emails and confirm when the last one is being issued).

At this stage I would be grateful just for an acknowledgement of receipt.

Many thanks

Chris Dance

Associate

LPC (Trull) Ltd

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Lansdown Grange Farm, Bath 03

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Final Email

Additional Information

Chris Dance

Associate

LPC (Trull) Ltd

Trull

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Lavinia Corrick

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam

I feel very strongly that the Partial Update as it is proposed does not assist the Council to accurately plan for the future. The current Coronavirus Pandemic and the Climate Change Emergency coming as they do after 10 years of austerity has completely changed the housing and economic outlook. The Core Strategy requirements no longer reflect the up to date position and in its current form the Partial Update does not enable the identification of those in need (it is likely that unemployment will rise and incomes fall in the months and years ahead). Basic data gathering is required to establish what a post Covid 19 landscape will look like, who is going to need help with housing, what sort of homes and business premises are required and where. Further it is not clear where the Council's income will come from. Social care requirements, a reduction in business rates and rental income will reduce the amount of money for climate change measures and supported housing projects. Private development will therefore be the primary means of building homes. Unfortunately, our experience in Writhlington has been that some private developers require substantial supervision to ensure that communities are not taken advantage of and I have concerns that the considerable demands on Council services will make it difficult for BNES Council and Town Councils to provide the checks required. In any case under the Placemaking Plan only a marginal shortfall in housing supply against Core Strategy requirements towards the end of the period was identified which would allow time to look at the seismic impact of Covid 19 and the implications for jobs, transport, housing schools and social care.

In March 2019 BNES Council declared a Climate Change Emergency and stated that the Council's purpose is to improve people's lives and its core policies are "addressing the climate and nature emergency and giving people a greater say". Within a year of making this declaration the Partial Update was announced which gave residents battling loss of income, illness, problems with childcare whilst dealing with the emotional effects of lockdown a very limited time to respond to the Council's proposals. The sole publicity of the Partial Update has been on line and this has significantly excluded those either not able to access the website (libraries being closed) or technologically incapable of doing so. What also seems to run counter to the Council's declared intention is the fact that two sites in Writhlington, RAD25 and RAD26, are still on the Local Plan as "suitability not proven" when the Planning Officer himself overturned a recent planning application for 160 homes. He made his decision on the basis that the site was located outside the Housing Development Boundary, it lacked suitable cycle and pedestrian connections (which due to the topography would be most difficult and expensive to correct), the severe cumulative impact on the road networks, the fact that the site has been proven to support Horseshoe Bats and other important flora and fauna and is situated in an area of archaeological potential. Further, 234 objections were made by local residents on the basis of many "green" issues - that there is very little employment and out commuting is the only option for most people, the majority of facilities are located 1.5 miles away accessed by a very steep hill (and public transport is poor), there is currently significant water run off, and, the fields in question are productively farmed. Both actions breach the Council's stated core policies. As a result there is a groundswell of distrust; residents believe their opinions are not taken into account and there is little appetite within BNES Council to change the way business is conducted to implement Climate Change measures swiftly.

Looking at the content of the Partial Update most proposals do have an affect on the Core Strategy. Even some of the proposed measures such as walking and cycling paths which appear to be stand alone proposals will be dependent on wider plans for an area. The situation on student accommodation for example is very unclear. Will students be returning to University in September 2020 in the same numbers? Will they wish to undertake courses which will be mainly undertaken on line and will they be willing to pay the same level of tuition fees for these courses? Additionally, would they be prepared to move away from

home in these circumstances or would a large proportion prefer to "stay local". Of course Bath University attracts a significant number of foreign students and it is very unclear whether they would be able or willing to come to the UK. It is therefore very difficult to assess whether useful policy on this issue could be undertaken until the position is clearer. The same would be true of policies on hotel accommodation. How will tourism return to Bath? Will tourists be made up of UK citizens and how quickly will foreign visitors return? What sort of accommodation would they require? More significantly it is not at all clear how people will be working in the future. Will the success of home working mean that it will continue? Will people attend the office on some days and if they do will they drive and would this have an impact on car parking policy, availability of charging points, public transport policy and air quality targets? Will the increase in on line shopping continue and how many retailers will survive the loss of footfall from fewer tourists, fewer office workers and the inability of shoppers to browse for items? Would there as a consequence of a reduction in retail businesses be a larger number of buildings available to convert to residential accommodation? What would our towns and City look like with the possibility of more housing, high tech industries and commerce all vying for good quality accommodation? Any Planning Policy post Covid 19 needs to examine opportunities for employment as a matter of urgency. There will clearly be a need to attract businesses to BNES. What sorts of businesses could be established quickly? Where will they be located and can the new technological digital industries be encouraged? All of these questions will affect transport policy, housing, schools, medical and leisure facilities.

Whilst I agree that the Partial Update measures to improve standards of sustainable construction, zero carbon development, renewable energy, ecological enhancement and green infrastructure can go ahead as stand alone proposals (particularly so that the new Environment Bill can be enacted) the other proposals will have a knock on effect on the replenishment of housing stock and therefore should not be undertaken, for the reasons I have given above, until better data is available. Whilst I am arguing that the Partial Plan in its current form should not go ahead it would be sensible to identify new sites for planning purposes. However it should be made clear to residents that the Council will look at brown field sites, utilising unoccupied buildings or repurposing accommodation first and only in extremis consider for development sites where the following applies:

- where traffic congestion is already causing severe problems
- there is limited employment and out commuting is the only option
- support infrastructure and facilities are at capacity
- productive farm land would be used
- flooding problems would be exacerbated
- sites rich in history, flora and fauna (National Planning Policy Framework requires policies and decisions to contribute to and enhance the natural and land environment by minimising the impact on, and providing net gains for, biodiversity)
- sites currently designated as greenbelt

I consider that there has been a lack of structured housing and business development both in BNES and in neighbouring Authorities. It would appear from the scattered and unsupported developments (Orchid Way in Writhlington and the ex Charlton's complex at the bottom of the Frome Road are among many examples) which have recently been undertaken that traffic modelling and infrastructure needs have not in the past been fully taken into account. This cannot and should not continue. The current situation does allow us to take stock and really examine the needs of our community and I urge Council Members and planners to do so by putting in place a new Local Plan using innovative ways to consult with as many residents as possible.

Yours faithfully

Lavinia Corrick

Respondent LEONARD SHEEN

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

There seems to be a focus on more development in rural areas. Given the Climate Emergency, creating homes away from centres of economic activity would be a bad idea. Rural Transport is very poor; there is a reliance on cars; the rural poor cannot afford new electric vehicles. Development needs to be focused on existing centres not on RA1 villages.

Respondent Lester Cruse 01

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

I have been given information regarding the proposal to develop land off Old Road, Writhlington (RAD25 and RAD26) and feel very strongly against these plans. I am writing to you to express these concerns and hope that you will join me in opposing the development.

The access to and from this site is already very difficult especially at school times and it is a miracle that a child has not already been injured or killed. I would suggest that you visit the site at peak times (7:45-9am <x-apple-data-detectors://4> and 2:45-4pm <x-apple-data-detectors://5>) to see for yourself the mayhem on the road as it currently stands. If you then were to add 160 homes which would equate to at least 300 more cars and people it would be a nightmare.

The infrastructure in the area will not sustain this development. The availability of school places and capacity at doctors surgeries would also be an issue. I also have concerns regarding the water levels and drainage.

Another reason to oppose these plans is the effect that they would have on the environment. At present there are many different species of birds and animals in the area including birds of prey, owls, badgers, foxes and slow worms. These would all be put at risk if the developments were to take place on the site.

Writhlington has recently reached its quota of new housing developments with the homes that were built next to the school. This has satisfied the requirements for the area and should not be furthered.

I thank you for taking the time to read my concerns and hope that you will take them into consideration when making decisions regarding RAD25 and RAD26.

Kind regards,

Lester Cruse

Respondent Lester Cruse 02

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear planning committee reference RAD 25 and RAD 26, I've lived at the top of the Combe in writhlington for the past twenty three years and in that time I have seen terrible accidents in the Combe , where the lanes around this area are too narrow to take the flow now. There are no footpaths in the lanes low and narrow bridge . Walkers take there lives in there hands , wile walking them, let alone the people riding their horses, where in this area there is a lot of horse'e people.

I'll give you some examples of what I've seen and been involved while living here, driving my works van home, coming up the Combe , I saw a builders van coming down the Combe, I new he wasn't going to pass me so I drove into the bank and stopped but he didn't, he took my off side mirror off, and the car behind me hit me in the back causing me whiplash to the affect it broke my neck (d-2) the only time in my life I've ever had a bone fracture, i had to spend the next three months in a aspen collar the consultant told me that I'm lucky to be alive , another time I was hit wile coming home in my Land Rover again I was stationary I could see what was about to happen, the driver of the citran car hit the front off side wheel and landed underneath the front of my vehicle.

Since living here it's never been salted in the bad weather, in the last four or five years I've never seen the roads drains cleaned out, I try and keep the ones near my property clear as much as possible.

All this is now.... before you start thinking about building more properties in this area, surely you must think about the infrastructure first the lanes just can't cope with the amount of traffic now, gladmens were rejected on a request for 170 property's with the lack of infrastructure and access, so how come this , application for a proposal of 370..? It's just crazy

I could go on and on about the problems about the amount of traffic in the Combe and accidents in the narrow lanes around here but I think I've said enough. I will not use the lane coming from peasedown bypas because it's too dam dangerous. I'll put up with the queuing and go into radstock and come out on the frome road, it's not worth the risk. The amount of maintenance on the Combe , last year before Christmas I reported a drain collapse of about 16 inches in depth this was in the side of the lane and it still hasn't been repaired yet.

So if this building proposed plan gets the nod and is past, how much more pain have the resistance in this area got to put up with

Yours sincerely

Lester cruse.

Respondent Liz Alvey

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have the following policy suggestions for adoption into the Local Plan Partial Update: 1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space

(especially to PBSA uses) and to provide opportunities for small and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent London Road Nottingham Ltd

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

On behalf of London Road Nottingham Ltd. please find attached a response to the current consultation on the Local Plan Partial Update.

Please contact me if you have any queries.

Kind regards,

Tom Edmunds

Consultant

Walsingham Planning

Bourne House, Cores End Road, Bourne End, Buckinghamshire SL8 5AR

Attachment included with response. Please contact to request to view

Respondent Louise Morrison

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Local Plan Partial Update Policy Review The consistency of some of the Policies in the partial update shown to be reviewed and those that are not, creates conflict with the policies written in the current Core Strategy. I give two examples but there are more and the danger is the ambiguity and confusion that will be created by not adhering to the already adopted Core Strategy. DW1 - Page 5 of the Core Strategy (CS) DW1 Refers to Table 9. Yet on Page 177 of CS it states that 'the review (5 year) will be informed by regular monitoring as set out in Table 9'. It is explicit in the CS policy that 'DW1 should be reviewed as part of any update'. PMP CP8 - Page 124 of the Core Strategy, 5.2 Housing. It states Policy RA1 should be considered alongside Policy CP8 Greenbelt. If Policy RA1 is being considered for update review then so should Policy CP8 Any Local Plan partial update must be consistent with the current Policies in the already adopted Core Strategy and Placemaking Plan. L Morrison Windrush Upper Bristol Road Clutton BS39 5RH Tel. 7594598126

Do you have any other specific observations to make on the Local Plan Partial Update?

Local Plan Partial Update Pg 9 Pt 13b - Add Protection of Groundwater to list. Pg12 Pt 16 Add to evidence base Groundwater, underground hydrology audit to include Water Wells, Boreholes and Underground Water Courses. The reason Bath and surrounding

What are your views on the new Draft Statement of Community Involvement?

Response to B&NES Consultation on Statement of Community Involvement for Planning April 22 Dear B&NES District Council, I submit the following comments to your Statement of Community Involvement for Planning, April 22 consultation doc. 1. Only

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent M7 Planning 01

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

On behalf of our client, M7 Planning please find attached representations to the Local Plan partial review commencement document.

Please do get in touch should you wish to discuss.

Best regards

Cem Kosaner
Planning Director
Lichfields, The Quorum, Bond Street, Bristol BS1 3AE

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent M7 Planning 02

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir / Madam

Please find attached correspondence in respect of our land to the east of Sleep Lane, Whitchurch Village.

Kind regards

--

Matt Regan BA (Hons) MPlan MRICS
RICS Registered Valuer

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Mactaggart and Mickel Homes

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

With reference to the above matter, please see attached response on behalf of Mactaggart and Mickel Homes.

I would be grateful if you would kindly acknowledge receipt.

Many thanks.

Attachment included with response. Please contact to request to view

Respondent Marian Clements

Response Type: Online Form

Do you have any other specific observations to make on the Local Plan Partial Update?

In the section: RESPONDING TO CLIMATE CHANGE. I would expect to see clear guidelines which demand that all new build projects are designed with serious consideration of green space. The council should be actively encouraging the incorporation of new green

What are your views on the new Draft Statement of Community Involvement?

I would like to point out that this document outlines Tree Preservation guidelines but does not seem to address the vital need to plant many new trees in BANES. Are there plans to write clear guidelines to actively encourage the growing of new woodlands a

Respondent Marie Ashman

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Marie ashman.
Sunnyside.
Manor park.
Ba33nb.

OBJECTION.

For above.

These fields are farmed. Why are you even looking to build on green fields You put 60++ houses opposite writhlington school and also in radstock. With NO extension to Drs (as promised !!!!!!!!!!!) the road system is a joke especially when writhlington main school and st marys are open.
Traffic is horrendous getting onto frome road from ba33nb in rush hour times.
Church hill is a rat run already. And it would get severely worse as most would use that lane to cut across to peasdown.
Infrastructure kids safety public transport.
There will be at least an extra car each household these roads cannot support this.
They are already used as a race track.
Let alone the increase in pollution.

I Completely object to this planning.

Respondent Mark O'Sullivan

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs

In general I welcome the Local Plan Partial Update, which seems to me helpfully to address many of the most important changes which have taken place since the local plan period began, particularly in the fields of climate change and renewable energy. However I believe there are a number of other areas which also need to be addressed.

The most important is tourism and associated development issues. It has become clear in recent years that both the policy and the management of tourism in Bath have become increasingly poorly coordinated. There is a need for the Local Plan to play a real part, in relation to planning and development, in setting out a vision and an underpinning for the visitor economy. Bath is a small city, easily overwhelmed by mass tourism, and I believe that a conscious effort needs to be made to encourage high end tourism at a level which can be effectively and comprehensively managed. This should include the discouragement of cars and of tourist buses in the city centre, appropriate hotel accommodation and restaurant facilities, the promotion of small independent specialist shops at the expense of mass-market chain retailers, a major international conference facility, and better facilities for classic drama and music. There is also a need in planning and development control decisions for a clearer sensitivity to the Roman, Georgian and Victorian heritage: there needs to be a more integrated feeling for the World Heritage Site, and the World Heritage Site Management Plan should be adopted by the Council as a development planning document and hence as a formal part of the development plan. Bath's history has left it with an unusually high level of residential accommodation in the city centre, more reminiscent of Continental or Scottish cities than of English ones, and the resulting concentration of permanent residents plays an important role in stabilising the character of the city and regulating its evening and night-time atmosphere; the Local Plan needs to recognise this more explicitly and to set out policies which will sustain this character. There have been some more specific problems in recent years, particularly in points of detail, with those responsible for new development being given their way too much at the expense of the streetscape and the character of the city; comparisons with Edinburgh or York are not flattering. Some recent decisions, such as the permitting of the Foxhill housing development in a way which does not retain sound tree screening above the astonishing Cotswolds AONB landscape of Lyncombe Vale, must not be repeated and should as far as possible be mitigated: developers need to understand that if they are permitted to build in a World Heritage Site this is an extraordinary privilege, and they should not expect to be able to push their ambitions to the limits and beyond.

Again, it has also become clear that there is a tendency for housing developers to try to insist on large houses which will maximise their profit at a time when the size of households is in fact decreasing. In a tightly circumscribed city such as Bath this is a most unfortunate waste of precious development land. Whether such development is pressed for in an initial planning application or in subsequent negotiations for a variation, Council officers need to be able to rely on firm support from the Local Plan in turning such pressures away.

There has been a strong tendency in Bath in recent years for land to be developed for student accommodation, largely since the drafting of the current Plan. The current situation of the coronavirus has of course cast some doubt over the short-term future of higher education establishments, but it will remain the case that the extent of student accommodation in the city has now become so great as to run the risk of becoming a problem. Student accommodation provides no income to the local authority at a time when funding has become increasingly difficult, but it also runs the risk of changing the character of the city if it begins to dominate beyond a certain level, reducing the social cohesion articulated by permanent residents, affecting the retail and restaurant markets, transforming the night-time economy with higher levels of noise,

movement and disruption, and increasing problems of litter and fly-tipping. I believe that this is the time to identify this as a particular and significant problem meriting a clear vision of the way forward in a revised Local Plan.

I should like to mention that I had worked on these comments for an hour or two on the www.surveymonkey.co.uk website when the latter suddenly failed and I was obliged to repeat the work. Hence I much appreciate the opportunity to respond by email instead.

Yours faithfully

Mark O'Sullivan

Respondent Martin Stewart

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space (especially to PBSA uses) and to provide opportunities for small

and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Respondent Matt Gower

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have the following policy suggestions for adoption into the Local Plan Partial Update: 1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space

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Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Respondent Matthew Croft

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

In order to manage the future reality of tenants in 'co-living' blocks requiring cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

Lockable bike stores needed. High quality with excellent security & CCTV etc. for any future accommodation. Residents parking to be introduced to the surrounding streets.

Do you have any other specific observations to make on the Local Plan Partial Update?

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Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Matthew Green

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Responding to the climate emergency should be central to all aspects.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No comments on programme - I think the review should take place ASAP to reflect the urgency of the climate and environmental situation. However, I accept Covid19 could cause impacts to this.

Do you have any other specific observations to make on the Local Plan Partial Update?

Not at this stage - may have specific comments on carbon impacts later in process.

What are your views on the new Draft Statement of Community Involvement?

Nope - community should be involved, but agree with council that Covid19 can minimise the normal consultation process.

Respondent Maureen Jacobs

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

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Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Mendip Hills AONB

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

To you it may concern,

Please find attached Mendip Hills Area of Outstanding Natural Beauty (AONB) consultation response and covering letter to the Local Plan Partial Update for your consideration.

Yours faithfully

Judith Chubb-Whittle

Landscape Planning Officer, Mendip Hills AONB Unit

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Messrs Pera

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear All

On behalf of Messrs Pera, please find attached representations to the Bath and North East Somerset Local Plan Partial Update.

Could you please let me know once this has been received.

Please do get in touch if you have any additional queries.

Kind regards

Sean Lewis

Senior Planner

Attachment included with response. Please contact to request to view

Respondent Michael Cooke

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I strongly object to RAD25 and RAD26 being included in the partial update of the Plan for Housing Development for the following reasons:

The majority of the residents of the village of Writhlington object to these two greenfield sites, which are currently outside the Housing Development Boundary, being built on. It is considered that it would be a disaster for our village.

Our existing road system is already clogged during peak periods, especially when 1600 children are going to or leaving our two schools. It should be noted that the A362 (Frome Road) is the preferred route for ambulances travelling between Frome and the Bath RUH.

Any further development would destroy the character of our village, which is listed in the 'Domesday Book'.

These two sites are currently valuable productive farmland.

During the last four years sixty new homes have been built in the village, which is in excess of the village's obligation.

Radstock has a large number of ugly brownfield sites which should be built on not our farm land.

Writhlington's infrastructure is almost non-existent, we do not have a doctor or a dentist. We have a very very poor bus service, only a very small corner shop, and a small car repairer. How on earth would we cope with hundreds more people and cars?

Also there are no jobs for people in Writhlington other than at the corner shop and the garage so people would have to travel by car out of the village to work putting more cars on the already clogged roads.

Michael Cooke

Respondent Michael Norris

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/ Madame

I'm writing to you concerning the proposed housing development in writhlington of 370 houses .

We have recently bought a house in Manor Terrace (number 15) and have since been informed that the fields behind our house have been flagged up as possible development sites.

Upon speaking to neighbors I learnt that planning permission was asked for last year for these fields and was declined for a number of reasons and I can easily see why.

I don't understand how these issues which were a reason to decline last time can be overlooked and inable the go ahead this time.

We don't yet live at the house due to renovations but the time spent at the property before lockdown and over the last two weeks, of which I have been back at work at the property (I am a tradesmen) I have noticed how unsuitable the roads where they are proposing entrances are and especially the nightmare of the 5 way junction at the end. Add another 300 plus cars to these roads and there are going to be serious problems for everyone.

The junction is an absolute nightmare at most times throughout the day but especially rush hour and school pick up and drop off times and have already witnessed queues and near accidents on a few occasions and have spent so little time there. There is another junction halfway down Manor Road which our bedroom overlooks and yet again I have also witnessed a few near misses with people pulling out of there in to oncoming vehicles due to it being hard to see up the road past the parked cars in the street.

The road is really not suitable for more levels of traffic, especially the amount these houses will bring let alone the construction vehicles through the whole development process.

Down the other end of the road are lanes with signs clearly saying that it's unsuitable for heavy vehicles so they surely can't be used.

Some locals already use the road as a race track and I have no doubt accidents will soon become a frequent occurrence in the areas I have mentioned above.

My friends and work colleagues have described the junction as being awful when I have told them where we are moving to.

Part of the reason we were drawn to the area was the fact there are two schools at end of the road. I worry for the safety of my son when he starts school and my partner taking him if yet again the roads are going to be overloaded with more vehicles, they are already extremely busy as is and we hadn't realised this before buying the house, it may have put us off if we did.

We currently live in Bath in the community that saw the tragedy of the tipper truck accident a few years ago and I would hate to see something like that happen to our new community.

With the schools right there on this busy section of road I can't believe this development can even be considered again.

What would these homes do to school places and the local dentists and doctors surgery which are already at high capacity and could surely not cope with an influx of more people?

I have heard that there are brown fields around the area which would surely be a better place to build what with all the climate control situation we find ourselves in now a days, is that not a massive part of BANES priorities as I understand?

And I was led to believe that writhlington had met its new house quota for years to come.

Bath is crying out for these kind of developments.

I hope that all these reasons for it not to happen are agreed with by yourselves and that the same decision is made as it was on the previous occasion.

Thank you for taking the time to read this email

Kind regards

Michael Norris

Respondent Michelle Taylor

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I am writing to register my objection to the proposed local plan relating to RAD25 and RAD 26.

Both are Greenfield sites and RAD26 is a productive arable and grazing field.

Any proposed housing development would have a huge impact on the road system and adding a significant increase of traffic to the local area. Writhlington has a 5 way junction and the increase of traffic would put the children of the 3 local schools and other pedestrians at significant risk. The A362 to Frome is already a busy road with hidden dips and access from any development onto this road would significantly increase the risk of further accidents.

Any development in either sites would also use the two single-track lanes that leads to Peasedown St John and Bath. These lead to a 3t weight restriction over a narrow bridge and a blind 90° bend under the railway arch. This lane is often used as a short cut to Bath can be icy during the winter months and prone to extreme water run-off causing accidents.

Now that the Government, BANES and the Radstock Council have declared a Climate Emergency any housing development must not result in out commuting ,which would inevitably happen in this case,adding to more congestion and pollution to the local area. There is no local employment so any development would significantly increase the volume of traffic, congestion and pollution.

Writhlington has poor public transport and one small shop serving the area. The doctor and dentist surgery are already overstretched and are 1 mile away down a long steep hill.

The past 3 years there have been 60 new houses built adding to the pressure on the infrastructure and localised flooding to the road.Any further developments will have water run off even with sustainable drainage.

There are brownfield sites in the Somer V.alley that should be developed before any Greenfield sites are considered.

Writhlington has a rich history, with the Momouth Stone close to RAD25, local wildlife including fruit bats and slow worms RAD 26 and these need to be preserved for future generations.

Yours sincerely
Michelle Taylor

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent MNRE - Welton Bag, MSN

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Sir/Madam

Please find attached a copy of written representations on the above to meet with your required deadline.

Please could you acknowledge receipt in due course.

Thank you

Nigel Whitehead
DIRECTOR

Attachment included with response. Please contact to request to view

Respondent Mr & Mrs Vbranch

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I object most strongly to the developments proposed for these areas.

My wife and I walk the route from Writhlington Church upto Writhlington, along to Green Parlour and on to Single Hill and back regularly. We have already noticed increased traffic through the narrow lanes around the area, which becomes very dangerous at times, no doubt rat runs from Bath to wherever, trying to avoid the absolute chaos and congestion in Radstock, caused by the so called Regeneration. We live in Radstock, so we are perfectly aware of what it's like here and the Regeneration has not helped one bit. We enjoy our walks and do not like the idea of these peaceful areas being destroyed. There is no suitable employment in the area, which is why there is so much traffic on the roads, along with the noise and pollution it brings. There is minimal parking in the area so it would not generate any increased footfall to benefit any of the remaining businesses in the area. The schools are at breaking point. (My wife worked in Radstock school and is now works at Shoscombe school, so she knows what the situation is like, along with the parking chaos when the parents drop off and pick up "their little darlings". The waiting time for doctors appointments is getting longer and longer, the new Surgery proposed is not going to improve matters, having the doctors on one side of Radstock and the pharmacy on the other, extra houses along with the extra cars would not help any of these matters. Enough is enough, any extra developments in the area is simply destroying the villages that people find so attractive and it all because of money, more income to the Council coffers which is wasted in so many ways, which we witness over and over on our walks.

Mr & Mrs Vbranch.

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Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Mr and Mrs Charles Carr and Wessex Water

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

On behalf of our clients, Mr and Mrs Charles Carr and Wessex Water, please find attached our representations submitted in response to the Bath & North East Somerset Council

Local Plan Partial Update Public Consultation (April 2020).

I also attach a wetransfer link containing the document along with the full suite of appendices: <https://we.tl/n1j7z8k5wO>

I trust this attached is clear, however, if you have any queries or issues downloading the full document please do not hesitate to contact me.

Kind regards,

Tom

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Mr and Mrs Hinds

Response Type: Postal

[Empty box for response content]

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Mrs C Billinghamurst

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

NE6 Trees and woodland should be updated to take into account the devastating losses of ash trees in rural areas. The existing policy is biased too far towards urban areas.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

Yes. PMP - SR6 Water Street East Harptree is next to my property. I would strongly object to any dilution of the ecological safeguards in the existing planning permission, should this be reviewed. CP6 & NE5 I think that B&NES should work proactively wit

What are your views on the new Draft Statement of Community Involvement?

No

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Mrs Osborne

Response Type: Postal



Attachment included with response. Please contact to request to view

Respondent Natasha Hobbs

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have the following policy suggestions for adoption into the Local Plan Partial Update: 1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year') 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space

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Do you have any comments on the programme for the preparation of the Local Plan Partial Update?
No.

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

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Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent National Grid 01

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir / Madam

We write to you with regards to the current consultation as detailed above in respect of our client, National Grid.

Please find attached our letter of representation. Please do not hesitate to contact me via nationalgrid.uk@avisonyoung.com if you require any further information or clarification.

Kind regards

Chris Johnson

Christopher Johnson

Planner

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent National Grid 02

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir / Madam

We write to you with regards to the current consultation as detailed above in respect of our client, National Grid.

Please find attached our letter of representation. Please do not hesitate to contact me via nationalgrid.uk@avisonyoung.com if you require any further information or clarification.

Kind regards

Chris Johnson

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Natural England

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Mr Daone

Local Plan Partial Update and Draft Statement of Community Involvement

Thank you for consulting Natural England regarding the above – please find our comments attached.

Kind regards

Amanda Grundy

Lead Adviser

Wessex Team

Natural England

Horizon House, Deanery Road, Bristol BS1 5AH

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Network Rail

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

No

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

Do you have any other specific observations to make on the Local Plan Partial Update?

We would like to confirm with regard to Site Ref: WID15 that Network Rail still have aspirations for alternative uses of this site and are continuing to assess its ongoing railway related use, and potential release.

What are your views on the new Draft Statement of Community Involvement?

No

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Nick Sommer

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Should include focus on the City of Bath as a World Heritage site and to recognise conflicts with non-tourist activities. Also, in light of the Climate Emergency and environmental improvement, to make central urban areas pedestrian-centric. Control of urban gulls should be included.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No.

Do you have any other specific observations to make on the Local Plan Partial Update?

Just get some of the proposals implemented before a new administration seeks to change direction !

What are your views on the new Draft Statement of Community Involvement?

No.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent OBO Watkin Jones Group

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear BANES,

I write on behalf of our client, Watkin Jones Group, to submit representations to the commencement consultation on B&NES Local Plan Partial Update and Local Plan Policies Review. Please find these representations attached.

Please could you confirm receipt of these?

If you have any queries on the representations, please do not hesitate to contact myself, Bethan Hawkins, or Matthew Roe.

Kind regards,

Dan

Attachment included with response. Please contact to request to view

Respondent Ollie luxford

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good evening

I would like to object to the proposed building works on the above mentioned sites.

Both RAD25, and RAD26 are both sites that have successfully been used for farming purposes for many years. The road networks are already stretched as it is. Using the 'lane' that we call braysdown motorway will not be sufficient.

Church hill is already a dangerous road that has many incidents. Add 300+ houses into the mix is quite frankly idiotic.

I'm sure if you lived in writhing anywhere near manor road you would be objecting aswell.

I've lived where development has happened in previous properties, and it's never easy but the infrastructure there was considerably better.

I do hope you find somewhere more suitable.

Regards

Ollie luxford

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent P Vaughan

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir

LOCAL PLAN PARTIAL UPDATE 2020
Bath City Centre and Covid 19

I understand that BANES are currently undertaking a consultation process for the next Local Plan. Please accept the following comments on the use of the open space at the Recreation Ground, which is designated in the 2014 Plan (Policy SB2) as suitable for development.

Recent events have highlighted the danger of mass gatherings as a source of Covid 19 contagion. Figures show that the Cheltenham Festival, the Liverpool vs Atletico football match and the Manchester Derby were all three followed by a spike in deaths at local hospital trusts - between 2.5 and 3.5 additional deaths per day at local hospitals - as compared with similar hospital trusts elsewhere.

As citizens of a Heritage City we accept that, for economic reasons, Bath must continue to welcome tourists (some 5 million day-visitors alone in 2018). It is for each and everyone of us to attempt to minimize infection and create as safe an environment as possible, both for ourselves and for tourists who will understandably be reluctant to visit where infection is a higher than average risk.

Councillors must now question the wisdom of permitting an 18,000 seat STADIUM in the very heart of the City, overwhelming the streets, shops and cafes at regular intervals and thus putting the lives of citizens at additional and, I believe, unacceptable risk - a risk which might well be beyond the Council's control. When questioned why the recent Bath Half-Marathon had not been cancelled, BANES Leader stated (Bath Chronicle 14 May) "I don't think we had any powers we could have used - we just had to appeal to the organisers' better nature." And Wera Hobhouse's comment: "Local Government had been powerless to prevent the event".

It is far from certain that an effective vaccine will ever be produced and, more alarming still, scientists are united in their belief that Covid 19 will not be the last respiratory virus to strike. Both as individuals and as local and national authorities, we must consider carefully how our cities are used.

The Recreation Ground should be reinstated as an open Green Space for both Climate Change and Public Health reasons.

Yours faithfully

M P Vaughan

Respondent P.HALES

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

C5:CP5 Flood Risk Management and PMP:SU1 Sustainable Drainage should be reviewed in the context of Climate Change and the Climate Emergency. The increasing risk of flooding posed by Climate Change requires a greater focus on the catchment/regional control area immediately outside the development site, and also on the path of surface water to the receiving watercourse. When considering development proposals, these should be given equal importance to the SUDS within the site boundary. The Flood Risk Management and SUDS policies should be strengthened to require developers to demonstrate acceptable arrangements for overflow from the development site due to exceptional rainfall/SUDS failure, and the safety of the SUDS exceedance route regarding the flood risk to existing properties. Where the receiving watercourse falls under The Environment Agency's remit, the Agency should be consulted on the developer's proposals, regardless of which flood Zone the site is in.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Pam Penkman

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I would like to see the inclusion of CS:SD 1 Presumption in favour of sustainable development included in the scope, if only to state that the policy will be updated to align with any changes to the NPPF, in particular in relation to the acceptability of wind turbines (NPPF para.154) in areas which have not previously been identified in a local plan, e.g. a neighbourhood plan. Some neighbourhood plans date back several years to a time when renewable energy was not as widely supported as it is now, and may have been omitted purely because it was not topical.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No.

Do you have any other specific observations to make on the Local Plan Partial Update?

It is timely given the declaration of Climate Emergency by B&NES in March 219, which will require a change of emphasis and attitude in particular towards the quality of housing, the sustainability of transport, and local renewable energy generation.

What are your views on the new Draft Statement of Community Involvement?

No.

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Paul and Jill Britten

Response Type: Postal

[Empty box for response content]

Attachment included with response. Please contact to request to view

Respondent Paul Gulliford

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Reasons for objecting.

1. these sites are Greenfield sites that are being productively farmed. Farmland should NOT be built on.
2. the sites provide open space, strengthens existing landscapes and features.
3. the road system will not be able to sustain further pressure generated by another housing development . INtraffic would have a significant impact on traffic t congestion in Writhlington at the 5 way junction, putting the safety of the children and adults who attend the schools and centre for vulnerable adults at risk. Increased traffic will also have a severe and cumulative effect on the traffic system in Radstock
Some traffic from any development would inevitably use TWO SINGLE-TRACK LANES that lead to Peasedown and Bath. These roads lead to a 3t weight restriction over a very narrow bridge and a blind 90-degree bend underneath the railway bridge. They are prone to extreme water run-off, and during stormy weather they very often flood and in the winter are often dangerously icy, causing a lot of accidents.
4. Public transport is POOR, commuters cannot use it to get to Bristol, Frome, Bath or beyond for a normal working day.
5. the Government, BANES, and RADSTOCK Councils have all declared a CLIMATE EMERGENCY. Any housing development must not result in out commuting, with additional vehicles on our roads adding to congestion and pollution. we should be reducing not increasing traffic on the roads.
6. The infrastructure will not support such a development with local services such as the doctor and dentist already stretched beyond capacity. Public transport being very poor and due to the hilly nature of the area it is inappropriate to suggest people could walk or cycle to work , shop or access local services.
7. In the past 3 years over 60 new houses have been built in Writhlington that has already placed significant pressure on our infrastructure.
8. Writhlington is an area rich in history, flora and flora, this historic and natural environment needs to be preserved for future generations.
9. There are BROWNFIELD SITES that have not been developed in the Somer Valley. These should be developed before GREEN FIELD SITES are even considered.
10. Within the area there are many houses for sale or rent, including many new houses that have not sold.
11. Even with sustainable drainage there will be significant water run off with additional houses.
In addition - living on Churchhill it is already very dangerous with other drivers using it as a short cut through to Peasedown doing more than the speed limit both up and down the lane, on trying to get my own car out or back into my drive beside my house I am very often harassed by impatient drivers, as they have to SLOW DOWN
and the road being a single track road in places with very few passing places and there are no pavements to walk on so even walking is dangerous.

Paul Gulliford

Respondent Paul McDermott MBE

Response Type: Online Form

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Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

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To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

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Respondent Pauline Woods

Response Type: Online Form

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Do you have any other specific observations to make on the Local Plan Partial Update?

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Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Peasedown St John Parish Council

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

No

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

If the programme dates need to be amended for any reason (as they have done in the past) that the amended consultation deadline dates are set so as to provide sufficient time for Parish Councils to meet, consider their comments and approve them. Parish C

Do you have any other specific observations to make on the Local Plan Partial Update?

No

What are your views on the new Draft Statement of Community Involvement?

No

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent PERA

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam

Thank you for giving us the opportunity to comment on the above.

Please see attached comments from PERA.

Please acknowledge receipt.

With thanks,

Nigel Websper
For and on behalf of PERA

<https://www.pulteneystates.co.uk>

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Persimmon Homes Severn Valley

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good evening,

Please see attached the Persimmon Homes Severn Valley representation in relation to the above consultation which closes at midnight tonight.

Please get in touch should you have any queries.

Kind regards,

James

James Durant

Strategic Planning Manager

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Places for People Strategic Land

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/ Madam,

On behalf of our client, Places for People Strategic Land, please find enclosed our representations to the Bath and North East Somerset Local Plan (2011 to 2029) Partial Update Commencement Consultation.

If you have any queries regarding the content of these representations please do not hesitate to contact me. In the meantime I'd be grateful if you could confirm safe receipt of these representations.

Kind regards,

Sarah

Sarah Fordham

BA (Hons) MA MRTPI
Associate
Town Planning

RAPLEYS LLP

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent PlanningSphere Representations

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

FAO: BANES Planning Policy Team

Following my discussion with Richard Daone last week, please find enclosed a single representation letter from PlanningSphere that comments on: i) the scope of existing CS and PMP policies for review (Section 2.0); and sets out our site-specific promotion/interests (Section 3.0).

It is our intention to submit further site-specific information pursuant to a number of the site in accordance with the HEELA call for sites deadline of 15th June 2020.

I would be grateful if you could acknowledge receipt. We will be pleased to engage with the Council, as appropriate, going forward.

Regards

Chris

Chris Beaver

Director

PlanningSphere Limited

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Poplar Nurseries, Batheaston

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Local Plan Team

Further to your Notification below, please find enclosed a suitable Representation in respect of land at Land at Poplar Nurseries, Batheaston, Bath

At this stage I would be grateful just for an acknowledgement of receipt.

Many thanks

Chris Dance

Associate

LPC (Trull) Ltd

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent R Fox

Response Type: Postal



Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Redrow Homes Limited

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir / Madam

Please find attached Redrow's finalized representations to the Local Plan consultation. The attached supersede the representations submitted last week.

Kind regards

Emma

Emma Powell

Planning Director

Redrow Homes Limited

Redrow House

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Rentplus UK Ltd

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir / Madam,

Thank you for the opportunity to comment on the Commencement Consultation for the emerging Bath and North East Somerset Local Plan Partial Review. Please find attached representations on behalf of Rentplus UK Ltd. If you have any questions or wish to discuss these representations further, please let me know on the details below.

With kind regards

Jamie

Jamie Roberts MPlan MRTPI

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Principal Planner

TETLOW KING PLANNING

Attachment included with response. Please contact to request to view

Respondent Richard Berger

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have the following policy suggestions for adoption into the Local Plan Partial Update:

- [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure).
- [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance:
 - No purpose-built student accommodation will be permitted;
 - No purpose-built high-density co-living accommodation will be permitted;
 - Existing HMOs may not expand/increase their current permitted capacity.
- [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed.
- [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants.
- [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants.
- [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath.
- [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking.
- [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls.
- [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose.
- [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year').
- [PMP ED2B] (should be included in scope of Partial Update): In order to stem the loss of industrial space

(especially to PBSA uses) and to provide opportunities for small and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?
No.

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Richard Taylor

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear sir/madam I am writing to inform you of my dismay that you are thinking of moving the housing development boundary to include the above parcels of land, these areas are green belt and farmed to produce food. They are full of wildlife from bats to slow worms. The road system can not take more cars church hill is a rat run now and is a dangerous route for pedestrians and cyclists. The junction at the end of manor road is a nightmare to get out of in the morning due to school traffic and people going to work. Writhlington does not need more traffic from people driving to Bristol and Bath to work as there is limited employment in the the area and this will get worse after the vivid 19 lockdown ends and we find business not starting up again. I hope you take these points on board before you make any decision
yours sincerely Richard Taylor

Respondent Rob and Bridget Carter

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Rob Carter,

Dear Members of the Council.

I am writing to object to the proposed development areas known as RAD25 and RAD26.

As has been previously mentioned ad nauseam the idea of developing the two areas flies in the face of the declaration of a climate emergency by Bath and North East Somerset Council.

The local roads are unable to cope with the level of traffic that currently tries to use them, let alone should several hundred extra cars a day are forced down them.

There is little or no local employment in the area which means any residents in these proposed builds would have to commute to either Bath or Frome, if not farther afield.

You yourselves have opposed a proposed build by Mendip District Council on Knobsbury Lane due to excess strain being put on local services, so how are RAD25/26 any different?

One final question is how can you propose developing a site (RAD25) which is currently a Grade 2 listed building, i.e. Manor Farm House and The Wing, Manor Farm House? I can assure you that neither of the current residents have any intention to sell our homes for development any time before hell freezes over. Yes that's right, both myself and my mother live in the middle of your development area.

Yours in strongest objection,

Rob Carter and Mrs Bridget Carter.

Respondent Robert Davies

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs

I should like the following comments to be taken as part of the consultation process.

Robert Davies

I note the limited scope and ambition of the current update. It appears to be geared to the twin aims of satisfying the minimum legal requirement for a review and maintaining a defense against opportunistic development proposals related to housing delivery and land supply (with a nod towards the climate emergency). The need for a review arises from the demise of the JSP and, by extension, the new Local Plan sitting on the back of the JSP. The proposed update is very selective, as most issues are to be dealt with by a further Local Plan even though this hinges on the development of a new sub-regional strategy which may lie some years distant.

I suggest that the deferral of many vital issues to the proposed new Local Plan might be considered unsound. This is because, according to the Planning Advisory Service, a Review must, among other things, consider whether the Local Plan meets current national policy requirements. Particular emphasis is placed on meeting housing need as defined through the application of the standard methodology. As calculations of housing need in the Core Strategy pre-date the Standard Methodology, the figures need to be re-evaluated and if necessary incorporated into a policy update. The insistence that overall spatial strategy not be addressed in this update and the decision not to review and update policy DW1 is therefore likely to be unsound. There are many other instances in the review document where national policy has been changed but where there is no intention to address this through the current exercise.

With the climate emergency, the public health crisis and Brexit contributing to times of exceptional turmoil and deep-rooted uncertainty, it would seem complacent to place important issues on the back burner to await doggedly the development of a new Local Plan some years down the line. A more radical programme of review and update of a wide range of policies would be appropriate based on a comprehensive appraisal of the outcomes of existing policy.

There are many examples of policies which need addressing through a review and update. Some of these have been referenced by this exercise. For example, policy ST1 on Promoting Sustainable Travel is up for review particularly aspects related to climate change and promoting healthy life styles. A wider vision for this policy would see transport strategies that make the main urban centres-above all Bath, but also the other main settlements- car-free other than for people with disabilities and for deliveries, with electric vehicles becoming the norm for those and buses. I would also welcome connectivity planning for the rural areas that greatly strengthens bus services along route corridors and builds a hub and spoke bus network so as to improve connections both between rural settlements and the main urban centres and transport hubs.

I would also welcome a policy (blending aspects of RE1, CP8, ST1 and others) which gives a clearly articulated strategy for the rural areas and settlements that sits alongside and meshes with the strategy for Bath itself. This strategy would recognize and reinforce the benefits in terms of well-being and health of closely linking the urban centres and their rural settings (and in particular the precious Green Belt and AONBs) and ensures easy and sustainable accessibility from one to the other, both for business and leisure.

I am concerned that policy B4 on the World Heritage Site is not considered suitable for update. I believe inadequate weight is given to this policy considering the importance of WHS status as an asset and to tourism in the area. The policy has been compromised by intrusive developments impinging on the Bath skyline and I call for strengthening of B1 to prevent further encroachment in vulnerable locations such as Odd Down.

Another Policy not considered for update is CP9 on affordable housing. Yet surely this contentious issue is a prime candidate for Review and, if necessary, update. I would like to see a housing strategy that makes urban centres places where people want to live again and is primarily focused on and gives priority to affordable and social housing and is not dependent on continuing construction of 'high-end' housing to fund a small proportion of 'affordable' units.

I would suggest that certain of the documents produced in this exercise lack clarity of purpose. For example, the title of the 'Local Plan Partial Update Review' indicates that the contents represent the results of a review process. Many of the statements in the document suggest that this was what was intended. For example, the phrase used on many occasions (eg LCR6A, D5, RE2 and many others) is 'The policy remains relevant and does not need updating'. This implies that a review has been carried out whose results are recorded here and whose underlying argument is also recorded and could be referenced, and that the result of the review is that a policy update is not required.

However questionable the robustness of this scenario, the real issues come in policies such as RA1 (and other similar) where the statement is made that 'There is a need to identify sufficient housing sites to ensure a continuous housing land supply and sufficient supply to meet the overall Core Strategy requirement in accordance with the current spatial strategy. Through this process the number of dwellings directed to specific settlements identified in the Core Strategy and Placemaking Plan may require revision but not to the extent that this would alter the current spatial strategy. This may require Policy RA1 to be updated.'"(Para 27)

In no way can this be classed as a Review as defined in the PAS guide which states that to carry out a Review 'You will need to collect evidence to consider whether the vision, policy objectives and spatial strategy of your local plan are being effectively delivered and whether there have been any local changes which have spatial implications for the strategy'. This evidence will, as a minimum, include the results of Housing Delivery tests, the current 5 year housing land supply position and the Authority Monitoring Report(Para 28).

There is no indication that the Local Plan Partial Update Policy Review has consulted these sources and come to a conclusion as part of the review process that there is under delivery of housing or an inadequate land supply. The review process has yet to be followed which would indicate a suitable course of action, whether this be the more effective implementation of policy or a change in policy or, indeed, no action at all.

I suggest that B&NES should have come to the table after having scrutinized the evidence, much of which is produced as a statutory requirement, and come up with proposals, possibly in the form of options, for consideration in the Review document. Policies which require updating need to be chosen on the basis of a robust review process, and to state that Policy RA1 or RA2, for example, may require updating on the basis of the Review document presented might be considered unsound.

Furthermore, the actions of B&NES in issuing a Call for Sites might seem premature in that there is no Review in place indicating there might be a need for such sites. In fact, it must be pointed out that a Call for Sites and a HELAA based on that have been compiled recently as part of the JSP process so a further Call could be seen as redundant and wasting of officers' time. A more general observation can be made that the huge amount of data and analysis generated by the JSP at very considerable cost could be used to inform current studies but appears to be unavailable.

Finally, I am concerned lest confusion of purpose and method, as well as the lack of attention to basic principles and good practice, lead to this exercise sharing the fate of the JSP.

Respondent Robert Davies

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

On behalf of Priston Parish Council Priston Parish Council recognises that the demise of the JSP gives rise to the need for a Review and Update of the Core Strategy and Placemaking Plan. We note the limited extent of the process pending the construction of a new Local Plan. The Council would like the following points to be considered: 1. There is no consistency as to whether the “Local Plan Partial Update Policy Review” is the “Review” or is merely a document indicating in which areas the need for review arises. 2.

Some policies of particular relevance to Priston and similar communities are intended to be updated without any evidence that a review has been carried out. 3. The Call for Sites and the indication that development policies in rural areas (RA1, RA2 and Green Belt Villages) will have to be updated suggests that a review has already been carried out indicating that there is a shortfall of sites required to maintain a 5 year housing supply. Where is the evidence that this Review has been carried out? 4.

Even if such a Review had been carried out and showed that a call for sites was required to provide extra housing land to enable B&NES to achieve its Core Strategy objectives, Priston Parish Council objects to such housing being located in rural areas. In particular, it objects to any relaxation of the cherished principle of infill only as a criterion of acceptable development in Green Belt Villages such as Priston. 5.

Villages in the area have already had their resources strained by the housing requirements of the Core Strategy. Any further encroachment would impose unacceptable consequences on these villages. 6.

Diverting housing provision to the rural areas distant from employment opportunities would worsen the already serious traffic congestion and would be directly contrary to addressing problems of the Climate Emergency. 7. Priston Parish Council notes that the very limited approach utilised in this update seems contrary to the requirement to adjust to changes in national policy. On what grounds is it justifiable to ignore overall housing need in this update when the recognized basis for this calculation, the Standard Methodology, has changed?

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Robert Hitchins Ltd

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please replace the reps I submitted on behalf of Robert Hitchins Ltd last Tuesday with the attached.

I would be grateful if you could acknowledge receipt of this email.

If you have any queries , please do not hesitate to give me a call.

Kind regards,

Sarah Hamilton Foyn

Senior Director

Pegasus Group

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Robert Hunt

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

Please see attached objection to the above proposals. The fact that you are considering them again suggests there is possible official collusion with the developers that requires investigation!

Robert Hunt

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Robert Vause

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

see attachment

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

see attachment

Do you have any other specific observations to make on the Local Plan Partial Update?

see attachment

What are your views on the new Draft Statement of Community Involvement?

No comment at this time

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Robert Wheeler

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please find my objections to the above proposed housing sites which I totally disagree with.

Yours Sincerely

Robert Wheeler

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Robin Taylor

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Attachment included with response. Please contact to request to view

Respondent Roger Wiltshire

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear sirs,

I wish to object to the local plan, particularly the inclusion of sites RAD25 and RAD26.

I strongly object to site references RAD26 and RAD25 inclusion as possible areas for housing development in the BANES Local Plan.

Both RAD 25 and RAD26 are Greenfield sites and are still used as productive farm or agricultural land. Building development on these sites would go against Government advice.

Development of either site will have an effect on wild life.

Public transport links for both sites are poor with no realistic/useable commuter public transport to the local/nearest areas of employment such as Bath, Bristol, Frome or Trowbridge.

Writhington has only one small corner shop. The nearest shops are Radstock one mile away with an uphill walk all the way on the return route. It is unlikely, and for some people inappropriate or impossible, to walk, especially whilst carrying shopping.

The local infrastructure, doctor, dentist, schools would not be able to support any large scale increase in demand.

With regards for RAD 25.

The road access to this site via Manor Road is very poor. Manor Road, Church Hill and the route through

Lower Writhlington to the Peasedown Bypass is already being used as a rat run short cut for traffic which it can barely sustain.

RAD 25 is at the top of a steep hill and on a single track lane.

The access cannot be improved without major redevelopment of the road, which is highly unlikely as the plan includes a privately owned, Grade 2 listed building, which the owner has no intention of selling.

As mentioned above, the route through Church Hill, Lower Writhlington to the Peasedown Bypass to already used as a short cut rat run and is extremely dangerous, using single track lane, over a small bridge and under the old railway bridge, down and up a steep valley either side. It is highly likely people living on the RAD25 site will try to use this route.

The route identified above is in poor condition and cannot sustain more traffic.

The Manor Road- Frome Road junction is 5 way and will not sustain an increase in traffic that would be created by another housing development.

This junction becomes gridlocked at peak times such as the morning and evening commute, and school open and close.

There are 3 schools just off this junction which cause much traffic, and pedestrian traffic. The junction will not tolerate or cope with additional traffic from another housing development.

There will be a knock on effect of increased traffic in Radstock.

With regards to RAD 26

The road access to this site is very poor and will need major redevelopment of the access from the main Frome Road.

The route through Church Hill, Lower Writhlington to the Peasedown Bypass to already used as a short cut rat run and is extremely dangerous, using single track lane, over a small bridge and under the old railway bridge, down and up a steep valley either side. It is highly likely people living on the RAD25 site will try to use this route.

The route identified above is in poor condition and cannot sustain more traffic.

The Manor Road- Frome Road junction is 5 way and will not sustain an increase in traffic that would be created by another housing development.

There are 3 schools just off this junction which cause much traffic, and pedestrian traffic. The junction will not tolerate or cope with additional traffic from another housing development.

There will be a knock on effect of increased traffic in Radstock.

Roger Wiltshire

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Rosemary Carne

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Mr Daone,

Please find attached my submission to the Local Plan up-date review and consultation. I confirm I am citizen and resident of Bath.

Please acknowledge receipt of this submission and confirm it will be included in the review process.

Yours sincerely, Rosemary Carne

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Rosemary Naish

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Suggested amendment to policy RA1 so that it reads a) A)At least 3 of the following key facilities within the village or within a 2 minute walk for 8% of the population: post office, schools, community meeting place and a shop.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent S M Beck JP

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear councillors,

I write to you expressing grave concerns that despite overwhelming evidence the the sites Rad 25 and Rad 26 wholly unsuitable for development and rejected by Banes, why is it still being considered for development and in the structure plan. ?

I urge you to remove these sites from the plan to allow us to somehow cope with the traffic, the lack of amenities and work opportunities locally and not to inflame this situation further.

Yours Sincerely

S M Beck JP

Respondent Sally Martin

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have previously made my feelings known concerning the proposed building on the land behind Englishcombe Lane, and have been somewhat disappointed that issues raised some time ago seem not to have been addressed.

In relation to the local plan, I would repeat that as far as ecology goes, the councils own ecologist has suggested that this land is not suitable for development. The land is full of springs, causing issues further down the hill (Moorfields Road for example). These issues will be magnified should the land be developed. There are unaddressed issues surrounding transport, and in the light of COVID 19 and the need for social distancing, more space on pavements is going to be needed. Englishcombe Lane is extremely busy, and at this point in time, we have a once in a lifetime opportunity to prioritise the safety of cyclists and pedestrians, and everything should be done to make Englishcombe Lane safer; adding to the traffic is unacceptable.

Issues surrounding Management of the site still remain unanswered, and as such are a concern.

I appreciate the councils core policy for “giving people a bigger say” and encouraging “community involvement” and I would therefore like to see this land removed from the plan.

Your faithfully,
Sally Martin

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Salford Environment Group

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Whilst the encouragement of developers to engage the local community in pre-application consultation is sensible, B&NES Council should make it clear in its statement(s) that such consultation responses should not be used by the developer to declare support for any aspect of the development proposals from the local community without the prior express and written consent of local communities, i.e. from local community representatives.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No.

Do you have any other specific observations to make on the Local Plan Partial Update?

Not at this stage.

What are your views on the new Draft Statement of Community Involvement?

I refer to my comment in answer to question 1.

Respondent Saltford Parish Council

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Whilst the encouragement of developers to engage the local community in pre-application consultation is sensible, B&NES Council should make it clear in its statement(s) that such consultation responses should not be used by the developer to declare support for any aspect of the development proposals from the local community without the prior express and written consent of local communities, i.e. from local community representatives. There is a review of planning policies including those applied to HMOs (Houses of Multiple Occupancy). Saltford Parish Council asks for that review to include policies that impact on large properties used for AirBnB party houses (and other short term lets via other platforms) as a commercial operation? Specifically, comments regarding local policy RE7: Although it takes a while, it is reasonably straightforward to demonstrate that a residential dwelling has this change of use. What follows is that the owners may apply for a change of use from residential C3 category to residential C3 with commercial holiday let. The problem is that the owners may not be actually be living there throughout the majority of the week but claim they are. This claim can be made for multiple properties. A site visit by a planning officer has at least a day's notice. What is needed is supplementary planning guidance for local planning policy RE7. RE7 states "Change of use from a dwelling to visitor accommodation will be permitted PROVIDED 3a) that for LARGE properties, a SUBSTANTIAL private residential unit is retained." This could be clarified by stating that: The residential unit must be contained within the main dwelling (to stop owners decamping to an annexe or a caravan..) The private dwelling must be the dwelling to which B&NES Council Tax bills are addressed. As such Saltford Parish Council requests that supplementary planning guidance on RE7 is put in place.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No.

Do you have any other specific observations to make on the Local Plan Partial Update?

Not at this stage.

What are your views on the new Draft Statement of Community Involvement?

Please refer to comment in answer to question 1.

Respondent Sarah Gilliam

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir / Madam

I am writing to you as I strongly object to the inclusion of RAD26 and RAD25 as part of the BANES Local Plan for housing development in the Writhlington area of Radstock. As a Writhlington resident and parent of children at St Mary's C of E Primary School adjacent to the proposed sites, I felt it was important to share my views.

RAD26

This land is a 'Greenfield site', which has been used for many years to grow crops, which given the current global situation is invaluable, as the production of local food is crucial for the community.

There are a number of 'Brownfield sites' in our area which should be developed as a priority rather than developing on 'Greenfield sites' and I understand that The Government advises councils to avoid building on agricultural land. Also it sets a precedent; if one 'Greenfield site' is approved for development, then other sites will undoubtedly be put forward too and if approved, will change the character of the landscape in the local area.

Writhlington has already seen extensive development with over 60 houses built in the last two years; this now means that the quota for new houses has been exceeded.

Writhlington is a historical site and a haven for nature. Local residents often proudly share details of wildlife which they have spotted. The open space and landscape features make this a beautiful area in which to live and should be preserved for future generations.

The local infrastructure will not be able to support such a development with doctors and dentists and other local services already being stretched beyond capacity.

Public transport is very poor, and due to the the hilly landscape it's not feasible to suggest that people should walk or cycle to work or to the shops and other amenities. Any development here would mean people would be car dependent as there are few opportunities for employment in the Radstock area, meaning that people would be forced to travel by car.

The road system is already under strain and would not be able to sustain any further increase in traffic generated by another housing development, plus access points to and from a new development would increase the existing concerns among the local community regarding safety in the area.

The A362 Frome Road is already a busy road with a dangerous 5-way junction incorporating Frome Road, Knobsbury Lane, Old Road and Manor Road. These roads are often dangerously congested and gridlocked. Peak times are extremely hazardous for drivers and pedestrians and the area has seen a number of traffic collisions. The newly installed speed camera and the pelican crossing has done little to ensure the safety of pedestrians in particular children from the two local schools. Additional traffic created by another housing development will simply exacerbate the problem. The recent Orchid Way development has already increased the congestion here. In 2019 the rejection of an application by BANES to build 160 houses in Writhlington stated that the development would have a 'Severe and cumulative effect' on the road system in Radstock.

There are two single track lanes nearby which would undoubtedly be used by residents of a new development as a quick way out of town and to Bath (via the Peasedown St John bypass). Green Parlour, The Coombe and Church Hill and are often used as racetracks with frequent accidents occurring with people using the roads as rat runs often at excessive speeds. There is a 1.8m wide bridge, with a 3-ton limit and a blind 90-degree bend underneath the railway arch which also shows it's unsuitability to further traffic in the area. The excessive use of these roads currently makes it dangerous for horse-riders, walkers and cyclists and thwarts people's enjoyment and appreciation of the beautiful countryside in which they live.

Due to the declaration of a Climate Emergency by The Government, BANES and Radstock Councils, any housing developments must not result in commuting, with additional vehicles on our roads adding to congestion and pollution.

The Writhlington community feels very strongly that further development should not take place here. 230 objections were made to BANES in 2019 protesting against a planning application on RAD26.

RAD25

PLEASE NOTE: All of the above objections apply to RAD25 as well as what has been mentioned below.

RAD25 is an agricultural site which has been used for this purpose for years and more recently for raising free-range chickens and producing honey in particular.

The area identified as RAD25 I believe to be inaccurate as it includes a privately owned Grade 2 listed building which the owner has no intention of selling.

A development on this site would clearly change the character of the local landscape.

Access to the site would be on to Church Hill or Manor Road. Drivers would undoubtedly turn right out on to Church Hill to take a short cut to the Peasedown bypass (as mentioned above in my comments regarding RAD26) driving through the conservation area in Lower Writhlington over the narrow bridge (which goes over Wellow Brook) and under the railway arch which has the blind bend. Church Hill (an extremely steep road) is dangerous as it's in poor condition partly due to a spring that runs onto it as well as run-off from the hills.

This site provides habitat to a wide range of wildlife, including slow worms, deer, bats, birds and hedgehogs which would undoubtedly be severely affected by this development.

RAD25 and the area surrounding it are steeped in history where stands The Monmouth Stone, (a Standing Stone registered by The South West Heritage Trust) on the boundary with Church Hill. An ancient Lime Kiln is present in the adjacent field as well as two Grade 2 listed buildings adjacent to the site. The Conservation Area at the bottom of Church Hill also has further listed buildings in it as well as the site of Writhlington Manor, which I believe has links to George Washington. The Batch at the site of Lower Writhlington Colliery is very well known for being a rich source of local fossils.

There will also be issues with flooding which has become apparent after the Orchid Way development. Water now appears in places where it did not before so clearly the balance of natural drainage has been altered here. Even with sustainable drainage at the proposed site, there will be significant water run off with additional houses; another area for concern.

I do feel very strongly that RAD26 and RAD25 should be removed from the BANES Local Plan as it is vital to preserve the Writhlington landscape, history and wildlife and to maintain the well being of the local community especially during this difficult time.

Yours faithfully

Mrs S L Gilliam

Respondent Shoscombe Parish Council

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Thank you for allowing Shoscombe PC to have a time extension for the response to the Local Plan consultation. We have appreciated this. We have met remotely in both workshop form and as a full PC to agree the following statements.

- The PC has identified no sites in Shoscombe Parish for additional housing development.
- There should be no change to policies RA1, RA2 and GB1 and GB2
- There should be no change to the present designated boundaries of the Green Belt
- The Housing Development Boundaries in the Parish should remain the same as previously.
- The PC will accept 'infill' with the present normal planning consultation procedures but does not want larger housing developments.
- The PC would support a review of the local transport arrangements to include more sustainable, frequent and accessible modes of transport for rural areas. The PC is willing to work with BaNES and other local PCs to facilitate this.
- The Recreation Ground should continue as a community facility for exercise and recreation
- The allotments on Braysdown Lane should remain and further sites identified.
- The PC would oppose further development on the Shoscombe side of the Peasedown bypass....eg HELAA sites PEA10 and 15.

Thank you once again for your forbearance.

Respondent Simon Bond

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam

I strongly object to the inclusion of RAD26 and RAD25 as possible areas for housing development in BANES Local Plan.

1. Objections to the inclusion of RAD26

· The land is a Greenfield site, which has been used to productively grow arable crops for at least the last 200 years. It is valuable farmland that produces local food. The Government advises councils to avoid building on agricultural land. There are several Brownfield sites in our area, which should be developed as a priority. Writhlington has already exceeded the quota for new houses with more than 60 built in the last two years.

· RAD26 offers provides open space, strengthens existing landscape features and views to the open landscape. This field is also a vital habitat for a number of species as recorded by local residents. Writhlington is an area rich in history, flora and fauna; this historic and natural environment needs to be preserved for future generations.

· The infrastructure will not support such a development with local services such as the doctor and dentist already stretched beyond capacity. Public transport is very poor, and due to the very hilly nature of the area it's inappropriate to suggest people could walk or cycle to work, shop or access local services. A development here would be car dependent as there are few opportunities for work in Writhlington meaning that people would be forced to use their cars.

· The road system will not be able to sustain further pressure generated by another housing development. The A362 is already a busy road with hidden dips, access to/from a new development and the increased traffic would add significantly to safety concerns. The 5-way junction of Frome Road/Knobsbury Lane/Manor Road/Old Road is dangerously congested and frequently gridlocked, particular at peak times and is extremely hazardous for drivers and pedestrians at peak times and regular traffic collisions occur, despite the newly installed speed camera and the pelican crossing. The safety of the students from the 3 schools, who are forced to navigate it, is already compromised. Additional traffic, generated by another housing development, will only exacerbate the problem. The recent development, Orchid Way, has already added further to congestion here. The rejection of an application by BANES to build 160 houses in Writhlington in 2019 stated that the development would have a 'severe and cumulative effect' on the road system in Radstock.

Some traffic from any development would inevitably use two single-track lanes, Green Parlour/The Coombe and Church Hill, which lead to Bath. These roads lead to a 1.8m wide bridge, with a 3-ton limit and a blind 90-degree bend underneath the railway arch. They are prone to extreme water run-off, and in winter are often dangerously icy, causing accidents. They are excessively used, making it dangerous for walkers, horse riders and cyclists and also provide the nearest access from Writhlington to the cycle way as cycling down the busy A362 without a designated cycle lane is not acceptable.

- The Government, BANES and Radstock Councils have all declared a Climate Emergency. Any housing development must not result in out commuting, with additional vehicles on our roads adding to congestion and pollution.

- There is very strong feeling amongst villagers in Writhlington against further development here. In 2019 over 230 objections were made to BANES protesting a planning application on RAD26.

2. Objections to the inclusion RAD25

Please note: All of the above objections apply to RAD25 as well as the additional objections listed below:

- The area identified as RAD25 is inaccurate as it includes a Grade 2 listed building, which is privately owned, and the owner has no intention to sell.

- RAD25 has been used for agricultural purposes for years and is used to rear free-range poultry and has beehives producing honey.

- A development of the site would be very visible from the valley and would be detrimental to the landscape and visual character of the area.

- Access to the site would open on to Church Hill or Manor Road. Drivers would undoubtedly turn right out on to Church Hill to take a short cut to the Peasedown bypass driving through the two Conservation areas in Lower Writhlington across the narrow bridge over the Wellow Brook and under the railway arch which is on a blind bend. This development would make safe access to this green space even more hazardous and is approximately 80 metres from the single-track part of Church Hill, which is extremely steep, mostly single track with blind corners. The road is dangerous as it's in poor condition, there's a spring that runs onto it as well as run off from the hills.

- This site supports a wide range of wildlife, such as bats, deer, slow worms, hedgehogs as well as a

huge variety of birds, which would undoubtedly be adversely affected by this development.

· RAD25 and the immediate area surrounding and near it are rich in history with The Monmouth Stone, a Standing Stone registered by The South West heritage Trust on its boundary with Church Hill, an ancient Lime Kiln in an adjacent field as well as two Grade 2 listed buildings adjacent to it. There are further listed buildings in the Conservation Area at the bottom of Church Hill as well as the site of Writhlington Manor, which has links to George Washington. The Batch at the site of Lower Writhlington Colliery is well known for being a rich source of fossils.

Reasons for objection to RAD25 and RAD26

1. They are Greenfield sites that are both being productively farmed. Farmland should not be built on.
2. The sites provide open space, strengthens existing landscape features and views to the open landscape.
3. The road system will not be able to sustain further pressure generated by another housing development. Increased traffic would have a significant impact on traffic congestion in Writhlington at the 5-way junction, putting the safety of children who attend the 3 schools at risk. Increased traffic will also have a severe and cumulative effect on the traffic system in Radstock. Some traffic from any development would inevitably use two single-track lanes that lead to Peasedown and Bath. These roads lead to 3t weight restriction over a very narrow bridge, and a blind 90-degree bend underneath the railway arch. They are prone to extreme water run-off, and in winter are often dangerously icy, causing accidents.
4. Public transport is poor, commuters cannot use it to get to Bristol, Frome, Bath or beyond for a normal working day.
5. The Government, BANES and Radstock Councils have all declared a Climate Emergency. Any housing development must not result in out commuting, with additional vehicles on our roads adding to congestion and pollution. We should be reducing not increasing traffic on the roads.
6. The infrastructure will not support such a development with local services such as the doctor and dentist already stretched beyond capacity. Public transport is very poor, and due to the very hilly nature of the area it's inappropriate to suggest people could walk or cycle to work, shop or access local services.
7. In the past 3 years over 60 new houses have been built in Writhlington that has already placed significant pressure on our infrastructure.

8. Writhlington is an area rich in history, flora and fauna; this historic and natural environment needs to be preserved for future generations.

9. There are Brownfield sites that have not been developed in the Somer Valley. These should be developed before Green fields are even considered.

10. Within the area there are many houses for sale and rent, including many new houses that have not sold.

11. Even with sustainable drainage there will be significant water run off with additional houses.

Yours sincerely

Simon Bond

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Simon Bond

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Yes

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

Yes

Do you have any other specific observations to make on the Local Plan Partial Update?

Yes

What are your views on the new Draft Statement of Community Involvement?

Yes

Attachment included with response. Please contact to request to view

Respondent Simon Kilpin

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam

My comments relate primarily to elements within the scope of the Partial Update concerning self-build and the council's role in facilitating this, particularly in the context of the declared climate emergency.

I welcome the council's commitment to an increased environmental focus as part of an update to a local plan that already appears to give significant consideration to this, and suggest that in this vein, incorporating specific provisions for "Low-Impact Development", and proactively engaging with residents on the legally-mandated Local Self-build Register (required by the Self-build and Custom Housebuilding Act 2015), might increase the supply of affordable, innovative, environmentally-friendly housing in the area.

[Note: The Local Self-Build Register website currently reports that: "Most local councils are now exploring how to support self and custom build [...] We are inviting all local councils to provide more details on their activities. Currently we are waiting for an update on [BANES Council's] position" source: [http://localselfbuildregister.co.uk/localauthorities/bath-north-east-somerset-council/.](http://localselfbuildregister.co.uk/localauthorities/bath-north-east-somerset-council/)]

The Graven Hill site in Oxfordshire is a well-documented [see www.theguardian.com/money/2018/feb/10/custom-self-build-housing-graven-hill] example of how local councils can play an active role in stimulating self-build development. Cherwell District Council purchased unused MOD land and sold plots specifically to interested self-builders. This has so far yielded entire communities of architecturally innovative, affordable, and overwhelmingly low-carbon homes, all while turning a profit for the council. It would be great to see BANES council explore similar territory.

Please find below my specific comments/suggestions on a number of the "key proposed elements" set out in section 13 of the Commencement Document:

a) "Replenishing the supply of housing, primarily through the identification and allocation of new sites"

Identification by whom, allocation to whom, and how? Ideally, proactive identification by the council of underused agricultural/brownfield land, and liaising not only with landowners and conventional housing developers but also self-builders (either on an individual or group basis) through the Local Self-Build Register.

b) "introducing new policies or updating policies in respect of sustainable construction/zero carbon development"

Introduce specific planning provisions that permit and facilitate 'Low-Impact Development' (defined as "development which, by virtue of its low or benign environmental impact, may be allowed in locations where conventional development is not permitted"). This often involves locally-sourced natural materials, carbon neutral electricity supply, locally sensitive design and traditional 'green building' techniques, etc. on rural land that would ordinarily be protected from conventional development. Such provisions have been

successfully incorporated within the Welsh planning system, primarily as part of the 'One Planet Development' policy (TAN6, July 2010).

d) "Better enabling the delivery of affordable housing, especially in the rural areas, through reviewing the rural exceptions policy approach"

Engagement with the Local Self-Build Register over-and-above conventional housing developers would likely facilitate provision in these instances: Parish Councils and village residents are likely to be more amenable to the idea of development in their village by identifiable and personally approachable self-builders (the people who will be future members of the community) than by large corporate developers.

e) Revising the policy approach to better facilitate the delivery of custom and self-build housing

Hurrah!

I would be happy to present to the council further detail of the schemes and concepts mentioned if this would be helpful in the course of this, or any future, consultation.

Kind regards

Simon Kilpin

Respondent Simon Neath

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir

Regarding the above sites located in Writhlington, currently labelled 'suitability not proven'.

After the significant local opinion, reflected in the objections to the Gladman proposal in 2018/19, I am astonished that the status has not already been updated to 'unsuitability proven'.

Writhlington has been subject to poor development such as Orchid Way. Not only does this add nothing to the local environment, but has increased local traffic at a junction already overloaded by traffic. Since our small village has a Primary and Secondary School, there is a very significant number of pedestrians- staff, pupils and parents, together with associated traffic, both of which are considerable during busy periods. Added to the traffic to and from the leisure centre, the junction of Frome Road, Manor Road and Knobsbury Lane is a pinch point and presents significant potential danger to all road users.

During consultation over Orchid way, concerns were raised about traffic and flood risk, which were ignored. The consequences are very evident, with significant flooding this winter to the land to the south of Orchid Way. This land, within the Mendip boundary, remained under water for months, and a small river was created, flowing from the saturated land onto the Orchid way development. As there is no local employment, residents in Orchid Way travel by car to work, increasing the traffic flow to local roads already overwhelmed by the volume of traffic. Despite the flooding, this saturated land appears to be a site Mendip are considering for new development. This would add to the flooding issue, traffic issue and any Monies due to the local Authority to assist with local infrastructure would go to Mendip. Thus, Writhlington would derive no financial benefit but suffer all the negative consequences.

Writhlington is now facing a dual threat- on the one hand Mendip are keen to develop land on the BANES boundary as it is located on the extreme north of Mendip, and is therefore less contentious since Mendip residents are less likely to object. It appears, despite objections from the local population and statutory bodies, BANES have kept the above 2 sites as a back-up plan, if the quota cannot be satisfied elsewhere.

Since the Gladman proposal was rejected, BANES Highways Department has carried out inspections of Church Hill and The Combe, following up concerns about the use of these roads by HGVs. BANES had been unaware of the existence of the old and vulnerable bridge at the bottom of The Coombe and have now agreed to impose both weight and height restrictions on these routes as a result. We are currently awaiting signage to be installed. These 2 roads would be directly affected by any development on RAD25 and 26 and the imposition of further restrictions on them underlines their unsuitability for the increased flow of traffic arising from new development. It would not simply be the cars owned by new residents, but the vehicles of visitors, delivery vans and lorries (significant in this area), maintenance vehicles etc.

BANES own policies state that:

There is a need for

- increasing local food production-
- protecting and enhancing biodiversity
- Conservation and enhancement of the natural environment

RAD 26 is high quality agricultural land used to grow crops. It is home to bats, hedgehogs, slow worms, deer and a wide variety of birds such as owls, red kite and buzzards. It is not acceptable to suggest alternate habitat can be made available as evidence shows that in such cases the animals can die out due to a lack of care, even when protected by law.

BANES must adhere to its own policy regarding the Climate Crisis. New development must satisfy the requirement for it to be sustainable. Brownfield sites must be prioritised with housing located in areas where residents are not reliant on cars for transport

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Society of Merchant Venturers

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/ Madam,

On behalf of our client, The Society of Merchant Venturers, please find enclosed representations in response to the consultation on the Commencement Document and Policy Review for the Bath and North East Somerset (B&NES) Local Plan Partial Update. These representations are in relation to our Client's land south/ south-east Keynsham.

The following documents are attached:

- * Letter containing our detailed representations;
- * SMV Keynsham Estate Plan;
- * Uplands Farm, Keynsham Concept Plan.

Please can you confirm receipt of these representations.

Kind regards,

Ed Rehill
Associate
Planning

Attachment included with response. Please contact to request to view

Respondent Sophie Flook

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Councillor

I request that consideration is given to RAD 25 and RAD 26 and is removed from the Writhlington/B&NES Plan as being land available for future development.

PRÉCIS

- Writhlington has met its quota of new houses until 2029
- RAD25 and RAD26 are outside the Housing Development Boundary
- The road infrastructure is overloaded, not fit for further development and potentially dangerous.
- RAD25 and RAD26 are green field sites
- There is minimal employment in Writhlington so new houses means further commuting with a commensurate increase in road traffic commuting.
- The existing drains and sewage infrastructure is not suitable for an enhanced level of development.
- Limited public transport with no reasonable expectation of a commercially viable level of enhancement.

I am writing to you regarding the specific reference to the plans outlined for the Writhlington area, in context with the B&NES Topic Paper: "Developing an appropriate special strategy for non-strategic growth". This defines Writhlington as an RA1 village and suggests that for the years 2011-2029 50 new homes should be built in the area within the Housing Development Boundary (HDB). Writhlington village is already over this quota as 58 new houses have been built within the last 18 months; 55 on a housing estate opposite Writhlington School in Knobsbury Lane, the former Methodist Chapel in Frome Road has been converted into two dwellings and a new house has been built on the same road.

As Writhlington has met the target in the aforementioned topic paper, I would request that the B&NES planning committee reconsiders the marker placed on the plan against Old Road/Manor Road which suggests that this is an area with land available for residential development. In support of this request I would point out that both RAD 25 and RAD 26 are outside the Housing Development Boundary (HDB) and according to B&NES Core Strategy & Place-making Plan 'house development will be acceptable within the HDB and residential development outside the HDB will ONLY be acceptable if identified in an adopted Neighbourhood Plan. As far as I am aware Radstock has not developed a Neighbourhood Plan.

It should be stressed that the Place-making Plan 2017 BANES identified that in the Somer Valley there is a

'high level of existing housing commitments exacerbating the imbalance of housing over jobs', 'It is important that additional housing does not worsen the balance between homes and jobs and the out-commuting problem'. There is minimal employment in Writhlington so new house holders would all have to commute for work. Therefore any new development in the village goes against B&NES stated aim of 'reducing car use' and 'maintaining a low carbon economy'.

It should also be noted that Writhlington's infrastructure is extremely limited. It has only one small local shop and extremely limited public transport. Virtually all residents are dependent on car use as they need to travel to both employment and amenities. For most people employment is in Bath, Bristol or other areas, so there is likely to be a significant increase in traffic using Church Hill or Green Parlour Lane and on into Braysdown Lane in order to avoid Radstock centre, causing further problems and increasing the level of traffic on extremely narrow country lanes. These are regularly used by cyclists, walkers and horse riders, with a commensurate increase in potential danger to these groups which we should be encouraging. Indeed one of the entrance/exit points for the cycle path is off this lane. B&NES Strategic Objectives include 'ensur[ing] the location and layout of new development enables and encourages people to make the best use of public transport, walking and cycling'.

Public transport in Writhlington has been severely reduced and it is already dangerous to use alternative methods such as cycling on any of the access roads due to heavy traffic, including many commercial vehicles, and narrow steep lanes (1 in 4 in parts) with poor visibility.

The five road Manor Road/ Knobsbury Lane/ Old Lane/ Frome Road junction is gridlocked and dangerous at peak times with the already large amount of traffic caused by nearly 1500 children accessing St Mary's Primary school and Writhlington Secondary School. In addition there are the members of public accessing the local sports centre and customers visiting a local garage and MOT centre, and the corner shop. This junction already requires significant improvement. Access to both RAD25 and RAD26 would be along Old Lane, Green Parlour Lane, Church Hill or Manor Road. All these roads are effectively single track as they are narrowed into single track roads due to business, resident and visitor parking.

These roads are clearly unsuitable for the increase in housing identified. It has already been brought to B&NES council's attention the numerous accidents which have occurred on the 'rat run' between Writhlington and the Peasedown by-pass which involves Church Hill, Green Parlour Lane and Braysdown Lane. These lanes (1 in 4) are both steep and narrow with high hedges and poor visibility leading to a narrow bridge and railway arch on a blind right angle bend. Commuters to Bath use these roads to avoid the heavy congestion in Radstock town centre at peak times.

Increasing the level of traffic, the many students who walk down up and down Church Hill to access school from Peasedown St John already take their lives in their hands as there are no pavements and drivers who use this route as a rat run show them little consideration. These lanes require significant improvement. Clearly RAD26 and RAD25 are not suitable for development on the new Local Plan without significant upgrades of the current road and improved access.

The Placemaking Plan states 'there is no immediate prospect of large scale funding to trigger road infrastructure improvements within the plan period'. Thus not only is road infrastructure significantly overloaded and dangerous and will not support any more housing development, but there are no obvious or viable plans to improve the road network.

Suggesting that land in RAD25 or RAD26 is available for development appears to be at odds with B&NES Green Infrastructure Strategy. The proposed sites are green fields. Also B&NES has identified the woodland below RAD26 as a site of Nature Conservation Importance. Building on the hill above will increase water run off potentially contaminating and damaging this protected woodland. The drainage is already severely impaired since the housing development at Orchard Way opposite the Secondary School. In times of heavy rain the drains are overflowing sending rivers of rain down all the roads making driving conditions even more hazardous on the narrow lanes described above.

There is no drainage or mains sewer infrastructure in RAD26 and the slope of the land in both RAD25 and RAD26 would make achieving an effective drainage or sewage system extremely difficult.

Radstock's sewage system is already over capacity with the increased amount of housing in Writhlington and Radstock it would not sustain another development; it would take massive groundworks affecting more green field sites to implement a new system. It is also extremely unlikely given the parlous state of local government finances, that any funding would be forthcoming. Church Hill and Green Parlour Lane regularly flood with their inadequate drainage systems unable to cope and in the winter months icy conditions caused by water run-off frequently cause accidents to vehicular traffic. The water run off means the road surface is poor and damaged, further increasing the poor quality of these roads.

Furthermore the area of Writhlington is surrounded by the rural and farmland countryside. The fields are farmed and contribute to food production. Adding more housing to this area would alter the outlook and views, particularly from St Mary's Primary School, beyond repair. There are a number of protected ancient trees on the perimeter of RAD25; these are part of the many reasons this site has already been rejected as suitable for a proposed housing development.

The area is also primarily old mining land, any developments to infrastructure or building would require much additional investment to account for this.

To reiterate I would ask the Council to reconsider and for further consideration to be given to removing RAD 25 and RAD 26 from the Writhlington/B&NES Plan as being land available for future development.

Yours Faithfully

Sophie Flook

Please also note; none of the link on the B&NES website click through to the Contact Us page for Planning Applications... 31st May 1:50pm

Attachment included with response. Please contact to request to view

Local Plan Partial Update Launch Consultation Response - Respondent Sophie Flook

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent South Stoke Parish Council

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please find attached the formal response from South Stoke Parish Council to your Consultation on the Local Plan Partial Update.

The response was agreed and approved at the meeting of the Parish Council on 18th May 2020, Minute Reference 670.

In the present circumstances it has been both challenging and a significant effort to prepare, agree and present to yourselves.

Can you therefore, please formally acknowledge receipt of our submission, and confirm, as requested, that we will be given the opportunity to take part in every aspect of the ongoing consultation process, including the eventual Examination in Public. We request this as the Statutory Consultee on all planning matters affecting our Parish.

Yours faithfully

Geoff Davis

Clerk South Stoke Parish Council

Attachment included with response. Please contact to request to view

Respondent Sport England

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir / Madam

Thank you for consulting Sport England on the above Local Plan update including Policies Review document.

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 'Towards An Active Nation' (2016-21) identifies key changes in the delivery of the strategy:

- Tackle inactivity: more money and resources
- Invest in children and young people to build positive attitudes to sport and activity
- Help those currently active to carry on, but at a lower cost to the public purse
- Put customers at the heart of what we do/be welcoming and inclusive
- Help sport to keep pace with the digital expectations of customers
- Encourage stronger local collaboration to deliver a joined up experience for customers
- Working with a wide range of partners, using our expertise and investment to align
- Applying behaviour change principles to encourage innovation to share best practice

Sport England has assessed this consultation in the light of Sport England's Planning for Sport: Forward Planning guidance <https://www.sportengland.org/how-we-can-help/facilities-and-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, 2018).
- Sport England's Planning for Sport webpages (2020) <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>

Protection of Sport & Recreation including playing fields

PMP:SB19 University of Bath at Claverton Down

Sport England acknowledges that the NPPF is promoting "sustainable development" to avoid delays in the planning process (linked to economic growth). That said, the NPPF also says that for open space, sport & recreation land & buildings (including playing fields):

97. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) 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
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Sport England would be very concerned if any existing sport & recreation land & buildings including 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 considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 97) and against its own playing fields policy, which states:

'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England raised a number of concerns to the consultation on the University's Masterplan and these issues remain outstanding. We remind the Council and the University of para 97 of the NPPF and the need to protect sport and recreational land and buildings. This included loss of playing field land without adequate replacement playing field land.

If you would like any further information or advice please contact me at the address below.

Gary Parsons MSc MRTPI
Planning Manager

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent St William Homes LLP

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please find representation to the above attached.

If you have any queries, please do not hesitate to get in touch.

Kind regards,

Lucy

Lucy Bird

Planning Director

St James Group Limited / St William Homes LLP

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Stadium for Bath

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir / Madam,

Please see attached our clients response to the latest consultation. We would be pleased to discuss the contents of it with you further if that would assist, and look forward to engaging with you as the process continues.

I understand from Stephen George that potential new Local Green Space Designations are not being considered in this partial review. You will have our representations on that matter from last year, but I would be grateful if you could confirm that that is the case.

I'd be grateful if you can confirm safe receipt and that these are duly made.

Many thanks, and take care,

Tim

Tim Burden
Director

Turley

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Standard Life Assurance Limited

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good morning,

Please find enclosed representations to the Local Plan Partial Update Consultation, submitted on behalf of Standard Life Assurance Limited.

If you have any queries, please let me know, and could you please confirm receipt of this email and the attached documents?

Kind regards,

Fraser

Attachment included with response. Please contact to request to view

Respondent Stephen Hyde

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I strongly object to the inclusion of RAD26 and RAD25 as possible areas for housing development in BANES Local Plan

RAD26

The land is a Greenfield site, which has been used to productively grow arable crops for at least the last 200 years. It is valuable farmland that produces local food. The Government advises councils to avoid building on agricultural land. There are several Brownfield sites in our area, which should be developed as a priority. Writhlington has already exceeded the quota for new houses with more than 60 built in the last two years.

The area identified as RAD25 is inaccurate as it includes a Grade 2 listed building, which is privately owned, and the owner has no intention to sell.

RAD25 has been used for agricultural purposes for years and is used to rear free-range poultry and has beehives producing honey.

The entrances to these areas would have to be taken from Church Hill and the surrounding roads which are highly populated and would not be fit for purpose. please see link below:

https://www.google.co.uk/maps/@51.2916182,-2.4269977,3a,75y,90h,90t/data=!3m6!1e1!3m4!1s8yLHUI1CwvYbgU_6JMg6HQ!2e0!7i13312!8i6656

<https://www.google.co.uk/maps/@51.2916182,-2.4269977,3a,75y,90h,90t/data=!3m6!1e1!3m4!1s8yLHUI1CwvYbgU_6JMg6HQ!2e0!7i13312!8i6656>
Google <https://www.google.co.uk/maps/@51.2916182,-2.4269977,3a,75y,90h,90t/data=!3m6!1e1!3m4!1s8yLHUI1CwvYbgU_6JMg6HQ!2e0!7i13312!8i6656>
Maps

Find local businesses, view maps and get driving directions in Google Maps.
www.google.co.uk

This is a link to the area, as you continue down the road it becomes a tint country lane where two cars cannot pass each other, added to this issue is the fact that when we have any rainfall the lane becomes a waterfall'

Both Rad25 and RAD26 need to be withdrawn from any future projects as planning permission has been rejected historically.

If I may be of further assistance please don't hesitate to contact me.

Best regards.

Stephen Hyde

Respondent Stephen Marsh

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good afternoon,

I would like to make the following comments in regards to the local plan update that was issued in May 2020.

I object to the The Call for Sites currently opened by B&NES on the grounds that the need for additional sites has not been established by a review of housing delivery and 5 year housing land supply.

Additionally, I object to the intention to update the policies for housing development in RA1 and RA2 as well as Green Belt Villages. Evidence has not been given that there is any need for further development sites.

Furthermore, even if such a need were established, such a development taking place within the small rural communities within B&NES would be an additional objection as the ability to absorb new housing has already been surpassed by the Core Strategy requirements. New development in rural areas should reflect identified housing needs, which are likely to be for more affordable housing, and should initially be focused on rural towns and larger villages, accompanied by suitable public transport options.

Otherwise, further housing in rural areas would worsen the already severe traffic problems and would be in direct contradiction to B&NES policy to address the Climate Emergency as a priority.

Thank you for noting these comments, I look forward to seeing the plan develop further in the coming weeks.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Steve Osgood

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I urge you to seize the opportunity to recommend radical change to the present Local Plan as a consequence of

-Government's long terms requirements for ongoing Climate Change, necessitating a complete re-appraisal of the city's economic activity, housing density, open space, traffic etc

-Government's certainty that Covid 19 will not be the last pandemic, necessitating a localisation of essential services, artisan services, open space etc, all of which must accommodate future lockdowns.

-Councillors appreciation that the city's economic base is rooted in its historic environment which it can no longer afford to undermine. The adopted WHS management plan 2016-2022 must be recognised as a working model for a civilised environment, and referenced in future Applications.

For a lifetime asthmatic, a long retired Planner and now landscape watercolourist, the air quality, reduced noise and

light pollution, families out walking together, all make Bath a joy to live in at present - were it not for the isolation.

Do please register the below 4 attachments as submissions for the Local Plan scrutiny in relation to central Wards.

Best regards

Steve Osgood

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Steve Osgood 02

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Steve Powell

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

There are already enough PBSA in Bath. To build more then say that by doing so it will free up more HMO's for local families is ludicrous... it is just a way for the Universities to expand uncontrollably.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

There are already enough PBSA in Bath. To build more then say that by doing so it will free up more HMO's for local families is ludicrous... it is just a way for the Universities to expand uncontrollably.

Do you have any other specific observations to make on the Local Plan Partial Update?

There are already enough PBSA in Bath. To build more then say that by doing so it will free up more HMO's for local families is ludicrous... it is just a way for the Universities to expand uncontrollably.

What are your views on the new Draft Statement of Community Involvement?

There are already enough PBSA in Bath. To build more then say that by doing so it will free up more HMO's for local families is ludicrous... it is just a way for the Universities to expand uncontrollably.

Respondent Stowey Sutton Parish Council

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

This document sets out the high level aims of the local plan review & is relatively innocuous until we reach point 13 which discussed the supply of housing. (Only contentious paragraphs shown). c) Facilitating the supply of housing to meet specific needs e.g. including those of older people (potentially through the allocation of sites, revision of the policy approach towards elderly persons housing and reviewing housing accessibility standards). Any policy that talks about “allocation of sites” without mentioning community needs or consultation needs to be watched closely. d) Better enabling the delivery of affordable housing, especially in the rural areas, through reviewing the rural exceptions policy approach Any policy that talks about “reviewing the rural exception policy” without mentioning community needs or consultation needs to be watched closely. e) Revising the policy approach to better facilitate the delivery of custom and self-build housing Any policy that talks about “facilitating the delivery of ...” without mentioning community needs or consultation needs to be watched closely. h) Revisiting the approach to defining parking standards and reviewing & updating the parking standards themselves in light of the climate emergency As we have seen previously, B&NES officers frequently try to apply a county wide policy that simply does not take into account the difference between the facilities available to urban & rural residents, the difficulty of parking in Cappards Road shows the issues relating to the necessary higher use of private cars in an area where there is no effective way of commuting by public transport. Section 22 goes on to highlight. “This engagement will include a ‘call for sites’, enabling stakeholders to submit sites they consider to be available and potentially suitable for housing or employment development, or to help address the climate and nature emergency e.g. through renewable energy infrastructure. A strategy for engagement will be prepared and published setting out the opportunities for key stakeholders, including community representatives (such as parish councils), development industry and landowners, government and non-government organisations, to be involved in plan preparation especially during the options testing stages under Regulation 18.” Inevitably this will bring the usual crop of landowners hopeful that the many rejections the very same plots have received in the past will be overlooked this time, it is only through hard work & vigilance that this will be avoided (again). Section 26 states, “In light of the partial update some Neighbourhood Plans that currently conform with the adopted Core Strategy and Placemaking Plan may also need to be reviewed and updated in part or in full. This will be kept under review and parish councils advised accordingly. New Neighbourhood Plans will need to conform with the Local Plan (Core Strategy and Placemaking Plan) partial update” We have known for some time that the Stowey Sutton Neighbourhood Plan is likely to need updating to comply with the revised B&NES local plan, but it is important not to begin this process too soon, the effectiveness of the NP is weakened as a planning document from the moment it enters review & even on the current timetable the B&NES local plan is unlikely to be in place before 222. Summary We do not believe that at this point there is anything to respond to in the Local Plan partial update Commencement Document.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

We do not believe that at this point there is anything to respond to in the Local Plan partial update Commencement Document.

Do you have any other specific observations to make on the Local Plan Partial Update?

We do not believe that at this point there is anything to respond to in the Local Plan partial update Commencement Document.

What are your views on the new Draft Statement of Community Involvement?

Observations The processes for public and parish council consultation that this document sets out are entirely reasonable & it is something that we should keep and quote back at B&NES each time we find that they have fallen short of their commitment.

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Stratland, Hicks Gate

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

Please see our representations, prepared on behalf of Stratland (Hicks Gate) Ltd in respect of their interest at 'Hicks Gate, Brislington'.

I trust the attached is of use and I would appreciate if you could confirm receipt of this email at your earliest convenience.

If you have any questions, please do not hesitate to get in touch.

Kind regards,

Daniel Millward

Senior Planner

Pegasus Group

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Summix LRB Developments

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Planning Policy team,

Please find attached a representation on the Local Plan Partial Update consultation which closes today.

Kind regards

MARK REYNOLDS
DIRECTOR

Attachment included with response. Please contact to request to view

Respondent Susan Bond

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir or Madam,

Please accept this as confirmation of my stongest objections to the inclusion of RAD26 and RAD25 as possible areas for housing development in BANES Local Plan

RAD26

The land is a Greenfield site and prime arable land, which has been used to productively grow arable crops for at least the last 200 years. It is valuable farmland that produces local food. Bristol University is currently conducting tests to see if crops can be grown in areas traditionally left for grazing due to poor soil. They are doing so on the basis that future consumer demand for vegetables is likely to outstrip demand for beef and dairy produce. Why, therefore, should a housing development be proposed on prime arable land? The past and future legacy of the area resides predominantly in farming. Indeed the South West has a worldwide market for it's locally grown produce and should be preserved for future generations.

The Government also advises councils to avoid building on agricultural land. There are several Brownfield sites in our area, which should be developed as a priority.

Additionally, Writhlington has already exceeded the quota for new houses with more than 60 built in the last two years.

RAD26 not only provides open space on which to grow arable crops, it - preserves the livelihood of a large, generational farming community.

The borders of this field is also vital habitat for a number of protected wildlife species (badgers, buzzards, barn owls, bats, fallow deer), as recorded by local residents. Our increasingly threatened regions wildlife must continue to flourish where it can.

Writhlington is an area rich in history, flora and fauna; this historic and natural environment must be preserved throughout the whole of the Somer Valley and local environs.

The community has long suffered from a lack of infrastructure, eg effective bus services. Additionally, local public health services such as the doctor and dentist and local police already stretched beyond capacity.

Public transport is very poor, and due to the very hilly nature of the area it's inappropriate to suggest people could walk or cycle to work, shop or easily access local services. Occupants of further local housing developments would be a hundred percent car dependent to access local amenities and places of work.

Air Quality Degredation: A daily increase in the volume of cars in the Writhlington will raise levels of pollution heavily populated by early years school children and senior school pupils. The existing recreation ground behind Writhlington Village Hall is already in close proximity to the busy A362.

The surroundling road system will not be able to sustain additional pressure generated by car owners on another housing development.

The A362 is a busy road with hidden dips and fast traffic. Access to/from a new development and a general

increased traffic would add significantly to safety concerns for both road users and pedestrians.

The 5-way junction of Frome Road/Knobsbury Lane/Manor Road/Old Road is dangerously congested and frequently gridlocked, particular at rush hour where queues of cars form. It is extremely hazardous for drivers and pedestrians at peak times and regular traffic collisions occur despite the newly installed speed camera and the pelican crossing.

Young parents and upward of 100 pupils from 3 local schools are forced to navigate crossing the junction at least twice daily. Additional traffic, generated by yet another housing development, will exacerbate the problem. The most recent development, Orchid Way, has already added further to congestion here. The rejection of an application by BANES to build 160 houses in Writhlington in 2019 stated that the development would have a 'severe and cumulative effect' on the road system in Radstock.

A degree of increased traffic from any development would inevitably use two single-track lanes, Green Parlour/The Coombe and Church Hill, which lead to the A367 into Bath. These roads all lead to a 1.8m wide disused railway bridge with a 3-ton limit and a blind 90-degree bend under the arch.

They are also prone to extreme water run-off and flooding, and in winter are often dangerously icy, causing traffic collisions.

At present, the lanes are narrow, rural lanes which are used excessively. Built originally as 'country lanes' they were not designed for heavy, fast, commuter traffic. As such they do not have curbs, pavements or street lighting, they have countless 'pinch points' for single traffic, blind bends, poor road surfaces and overhanging vegetation. The lanes are known locally to be dangerous for walkers, horse riders and cyclists and sadly, wildlife. If anything, a substantial decrease in commuter traffic is needed.

The lanes also provide the nearest access from Writhlington to the cycle way as cycling down the busy A362 without a designated cycle lane is not an option.

The Government, BANES and Radstock Councils have all declared a Climate Emergency.

Any housing development must not result in out commuting, with additional vehicles on our roads adding to the social, environmental and climatic burden of increased congestion and pollution.

There is very strong feeling amongst villagers in Writhlington against yet further housing developments and the threat of 'urban creep'. In 2019 over 230 objections were made to BANES protesting a planning application on RAD26.

RAD25

PLEASE NOTE: All of the above objections apply equally to RAD25 as well as the following:

The area identified as RAD25 is inaccurate as it includes a Grade 2 listed building, which is privately owned, and the owner has no intention to sell.

RAD25 has, historically, been used for agricultural purposes and is presently being used to rear free-range poultry and to support a colony of bees in beehives. Local residents buy the resultant produce and have done so for years.

A housing development of the site would be highly visible from within the Somer Valley, designated as an Area of Outstanding Natural Beauty. This would dramatically change the natural landscape and visual character of the area.

Access to the site would open directly on to Church Hill or Manor Road. Commuters would inevitably turn right on to Church Hill, a single track, country lane, to take a short cut to the Peasedown bypass or the busy

A367 into Bath. This commuter traffic would drive through the two Conservation areas in Lower Writhlington, across the narrow bridge over the Wellow Brook and under the railway arch which is on a blind bend.

Even if, as a conservative estimate, between 80-100 additional vehicles were to use Church Hill twice a day, it would result in an extra 160-200 road trips along the lane.

This development would make safe access to this green space even more hazardous and is approximately 80 metres from the single-track part of Church Hill, which is extremely steep, mostly single track with blind corners. The road is dangerous as it's in poor condition, there's a spring that runs onto it as well as run off from the hills.

This site supports a wide range of wildlife, such as bats, fallow deer, slow worms, and is the hunting ground for barn owls, buzzards, the occasional red kite, badgers, hedgehogs and a huge variety of birds. All these protected species would undoubtedly be adversely affected by this development.

RAD25 and the immediate and nearby surrounding, are rich in history with The Monmouth Stone, a Standing Stone registered by The South West Heritage Trust on its boundary with Church Hill there is also an ancient Lime Kiln in an adjacent field as well as two Grade 2 listed buildings adjacent to it. There are further listed buildings in the Conservation Area at the bottom of Church Hill as well as the site of Writhlington Manor, which has links to George Washington. The Batch at the site of Lower Writhlington Colliery is well known for being a rich source of fossils which make them Areas of Scientific Interest.

Yours faithfully,

Mrs Susan Bond, resident.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Sustainable Land Products, Fosseway Gardens, Radstock

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir/Madam,

Please see our representations, prepared on behalf of Sustainable Land Products Ltd in respect of their interest at 'Land north of Fosseway Gardens, Radstock'.

I trust the attached is of use and I would appreciate if you could confirm receipt of this email at your earliest convenience.

If you have any questions, please do not hesitate to get in touch.

Kind regards,

Daniel Millward

Senior Planner

Pegasus Group

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Sydney Buildings Householders Association committee

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Yes

Do you have any other specific observations to make on the Local Plan Partial Update?

Yes

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Taylor Wimpey - Chilcompton Road, Midsomer Norton

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs,

Please find attached representation to BANES Local Plan partial review on behalf of Taylor Wimpey for land at Chilcompton Road, Midsomer Norton.

Please let me know if you need any further information.

Regards

Lawrence Turner

Planning Associate

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Taylor Wimpey - land at Manor Road, Keynsham

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs,

Please find attached representation to BANES Local Plan partial review on behalf of Taylor Wimpey for land at Manor Road, Keynsham

Please let me know if you need any further information.

Regards

Lawrence Turner

Planning Associate

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Taylor Wimpey - land at Minsmere Road, Keynsham

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs,

Please find attached representation to BANES Local Plan partial review on behalf of Taylor Wimpey for land at Minsmere Road, Keynsham

Please let me know if you need any further information.

Regards

Lawrence Turner

Planning Associate

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Taylor Wimpey PLC and Vistry Group

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs

On behalf of our client, Taylor Wimpey PLC and Vistry Group, please find attached representations to the Local Plan Partial update consultation.

Please can you confirm receipt of this email?

Kind regards

Luke Challenger MRTPI

Associate

Black Box Planning Ltd

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent The Abbey Residents Association (TARA)

Response Type: Online Form

Do you have any other specific observations to make on the Local Plan Partial Update?

Yes. Comments on behalf of TARA members are in preparation.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent The Royal United Hospitals Bath NHS Foundation Trust

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

FAO: Planning Policy (Local Plan partial update)

On behalf of The Royal United Hospitals Bath NHS Foundation Trust (the “Trust”) we wish to make representations to the Local Plan Policies Review document (April 2020) and specifically to Placemaking Policy SB18 Royal United Hospital. The Council identifies that this policy should be reviewed through the partial update and therefore are inviting comments and views on it including potential revisions.

As a major stakeholder, healthcare provider and employer within the District and sub-region, the Trust welcomes the opportunity to positively engage in the formulation and plan preparation process of the B&NES Local Plan update. Since Policy SB18 was first formulated significant progress has been made in implementing and building out the RUH North Redevelopment programme.

The attached representations outline the workstreams the Trust are now progressing in moving forward with their estate strategy planning both in the short and long term and where key changes are sought in updating SB18 to align with this. Specific reference is also made to both the NPPF and the requirements of promoting healthcare strategies and infrastructure provision within local plan making and also influential Government reports all supporting the ongoing RUH hospital modernisation programme and potential future government funding through the Hospital Infrastructure Plan.

To support these representation we provide proposed amendments and tracked changes for an updated SB18 Policy (refer to section 6 of the report).

The Trust welcomes the opportunity to maintain positive ongoing dialogue with the Planning Policy and Development Management Teams at B&NES in developing the Trust’s next phase of their estate renewal programme.

At this stage should you require anything further please let me know.

Kind regards

Cathy

Cathy Francis
Director - Planning & Development
JLL

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent The Silverwood Partnership

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please see attached document

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

Please see attached document

Do you have any other specific observations to make on the Local Plan Partial Update?

Please see attached document

What are your views on the new Draft Statement of Community Involvement?

Please see attached document

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Theatres Trust

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

PMP:LCR1 Safeguarding local community facilities is not a policy currently identified as being for updating. However, we consider the protection of valued community facilities could be made more robust and evidence requirements made clear. This includes ensuring there is no longer a need for a facility by the local community or the communities that use it, and that efforts to market over a sufficient period at a value appropriate for existing use without development potential and condition have been exhausted. This would ensure the policy better accords with the objectives of NPPF paragraph 92.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Timsbury Parish Council

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

These seem fine.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

The Programme is fine.

Do you have any other specific observations to make on the Local Plan Partial Update?

Timsbury Parish Council in general welcomes the review of policies but has the following concerns that are the context of this rural community. The 179 and 768 bus services that serve Timsbury are currently and long term at high risk of at least furthe

What are your views on the new Draft Statement of Community Involvement?

This seems fine

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Tom Charlton

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good Morning,

Please find attached,

Kind Regards

Tom Charlton

Business Development Manager

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Tony Griffin

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have set out my views before & they remain relevant 1. Whitchurch Village cannot cope with a further 25 houses which is entirely disproportionate to the area 2. The 'transport corridor' or road that has been suggested to join up with Whitchurch Lane is not sustainable because it will simply create havoc on an already busy & overloaded road. Both of these need to have other solutions

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

See above

Do you have any other specific observations to make on the Local Plan Partial Update?

See above

What are your views on the new Draft Statement of Community Involvement?

See above

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Tony Ware

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Attachment included with response. Please contact to request to view

Respondent Tracey McGuinness

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

1. [PMP B5, SB19, SB2] In order to balance the loss of key development sites within the city in recent years and to reduce the carbon footprint of a major local 'industry' sector, any future purpose-built student accommodation serving Bath's Universities must be accommodated on the Universities' respective core campuses (adjacent to teaching, student services and social infrastructure). 2. [PMP B5, H2] In neighbourhoods where the HMO Article 4 saturation threshold (two-stage test) has been reached or exceeded, the following measures should be adopted in order to avoid further pressure on local amenities and detrimental impact on social balance: a. No purpose-built student accommodation will be permitted; b. No purpose-built high-density co-living accommodation will be permitted; c. Existing HMOs may not expand/increase their current permitted capacity. 3. [PMP H2] In order to maintain control of the density of development in residential areas, development rights to increase a small HMO to 'sui generis' (i.e. large) HMO will be removed. 4. [PMP ST7] In order to manage the observed reality of student tenants in PBSA bringing cars to the city and to acknowledge the past failures of 'control by condition' or 'control by s16' arrangements, any new-build (off-campus) purpose-built student accommodation will be subject to a realistic 'parking standard' (e.g. .25 parking spaces per bed space), with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 5. [PMP ST7] In order to manage the future reality of tenants in 'co-living' blocks requiring / keeping cars for personal use to travel to work and social engagements, and to acknowledge the failure of 'control by condition' or 'control by s16' arrangements at other residential blocks, an explicit parking standard should be set to cover 'co-living' accommodation and other high-density residential developments on a 'per resident' basis comparable with parking standards for other C3(a) use developments with the usual proviso that on-site parking is not to be a chargeable 'extra' for tenants. 6. [PMP H2] In order to future-proof council policy ensuring that rental standards are maintained at a high level across the authority area, the HMO Article 4 Directive and additional licensing of HMOs should be extended to cover all B&NES, not just the city of Bath. 7. [PMP H2, ST7] In order to ensure that adequate consideration is given to the impact of larger HMOs on local parking, where the conversion of a house into an HMO (or the expansion of an existing HMO) would result in the number of bedrooms exceeding the number of bedrooms in the 'typical' or 'original' neighbouring property type by 2 or more, the application will require due consideration be given to local parking pressures. Where this pressure is already recognised as being 'high', the expansion of any such property should automatically be considered likely to have a detrimental effect on local on-street parking. 8. [PMP ST7] To ensure that the parking standards applied at the time of approval of PBSA are commensurate with the actual future property usage, (as well as to ensure the personal safety of student tenants) any new PBSA will carry a condition that rooms are to be secured for use by accredited students only and not to be offered on the short-term lettings market. Developments not built with such a condition should not be considered as purpose-built student accommodation, nor meeting a need for purpose-built student accommodation; the development proposal must therefore be considered as large-scale purpose-built shared living and be assessed by the requirements of general housing and development controls. 9. [PMP H7, H8] In order to future-proof the Local Plan in light of the emerging trend towards large-scale purpose-built shared living (known as 'co-living') development, it must be ensured that such development contributes positively to the local housing mix: developers will be required to make a contribution towards conventional C3 affordable housing, especially where industrial land appropriate for residential uses is given up for this purpose. 10. [PMP H7, H8] In order to ensure that Higher Education remains accessible for all, including those from lower-income backgrounds, PBSA developments must be subject to a minimum (e.g. 35%) 'affordable housing' quota, using a defined criterion similar to that in the emerging London Plan ('a PBSA bedroom that is provided at a rental cost for the academic year equal to below 55% of the maximum income that a new full-time student studying in Bath and living away from home could receive from the Government's maintenance loan for living costs for that academic year'). 11. PMP ED2B (should be included in scope of Partial Update): In order to stem the loss of industrial space (especially to PBSA uses) and to provide opportunities for small

and start-up industry, Wansdyke Business Centre and Dartmouth Avenue sites (and other such non-strategic sites in the more densely-populated areas of the city) should be prioritised for retention as light/mixed industrial use or as other office/employment space. 12. PMP NE2: The Building Heights Strategy should be adopted as supplementary planning guidance.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

no

Do you have any other specific observations to make on the Local Plan Partial Update?

To future-proof the Local Plan as far as possible, the Local Plan Partial Update should seek to proactively manage impending development trends, such as high-density co-living blocks in a way that does not impact on the availability of land for affordable

What are your views on the new Draft Statement of Community Involvement?

Council policy advocates pre-application consultation with local residents, especially for larger developments, but the process does not currently afford resident feedback any weight whatsoever in terms of shaping the application, which usually comes forw

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Transition Bath

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

see attached

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

see attached

Do you have any other specific observations to make on the Local Plan Partial Update?

see attached

What are your views on the new Draft Statement of Community Involvement?

see attached

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Trevor John

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I wish to comment on the two documents about the partial update to the Local Plan and would point out that Section 13 of the Act requires B&NES to consider any changes that may affect development in its area and the following changes are enormously significant and it should be blindingly obvious that their impact must be considered:

- * Brexit and the (widely) forecast reduction in both GDP and migration into the UK
- * Covid-19 and the forecast large and long-term reduction in GDP
- * Climate change.

It is farcical and illogical that para 8 of the "Local Plan partial update Commencement Document" says the strategic housing requirement will not be reviewed ie these dramatic changes are to be ignored by the update, while Para 11 then says that there is a marginal shortfall in supply and para 13(a) says that new sites need to be identified and existing sites reviewed.

If the three major changes referred to above are ignored and the housing requirement is left unchanged, this partial update will clearly be completely unsound.

Thanks

Trevor John

Respondent Ubley Parish Council

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Whilst the need to update the policies that take into consideration the Climate Emergency makes sense, the push to update and replenish housing supply suggests that either there wasn't enough in the original plan or there is a drive to increase the volumes. It would be useful for this to be made clear. Whilst Rural public transport is mentioned, it is important that this receives so serious consideration.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No

What are your views on the new Draft Statement of Community Involvement?

Only as noted in 1, namely that the Council more clearly explains its need to replenish the housing supply and that Rural public transport is given a serious focus

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent University of Bath

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good afternoon,

Please find attached a response to the above consultation submitted on behalf of the University of Bath.

I would be grateful if you could confirm safe receipt in the first instance, and keep me informed of progress with the Partial Update thereafter.

Kind regards

Mark Rose
Director

Attachment included with response. Please contact to request to view

Respondent Valerie Gulliford

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I have received a letter about possible development of 370 houses in Writhlington. RAD 25 and RAD 26

Reasons for objecting

These areas are greenfield sites and are productively farmed.

Farmland should not be built on.

The sites provide open space and strengthen existing landscape features.

The road system will not be able to sustain further pressure generated by another housing development.

Increased traffic would have a significant impact on traffic congestion in Writhlington at the 5 way junction putting the safety of children and adults going to the schools and centre for vulnerable adults at risk. .

Increased traffic will also have a severe and cumulative effect on the traffic system in Radstock.

Some traffic from any development would inevitably use two single-track lanes that lead to Peasedown and Bath. These roads lead to 3t weight restriction over a very narrow bridge, and a blind 90-degree bend underneath the railway arch the lanes are prone to extreme water run-off any time of year which causes them to flood at the bottom and in the winter they become dangerously icy, causing accidents.

Also Public Transport is poor so commuters cannot use it to get to Bristol, Frome, Bath or beyond for a normal working day.

The infrastructure will not support such a development with local services such as the doctors and dentists already very stretched beyond capacity. Public transport is very poor and due to the very hilly nature of the area it's inappropriate to suggest people could walk or cycle to work, shop or access local services.

In the past 3 years over 60 new houses have been built in Writhlington that has already placed significant pressure on our infrastructure.

Writhlington is in an area rich in history, flora and fauna: this historic and natural environment needs to be preserved for future generations.

There are BROWNFIELD SITES that have not been developed in the Somer Valley. These should be developed before you even consider Greenfield Sites.

Within the area there are many houses for rent or sale, including many new houses that have not sold.

Even with sustainable drainage there will be significant water run off with additional houses.

Living on Churchhill is Dangerous at the best of times, cars driving up and down way above the speed limit. if trying to pull out of our drive or reverse in to park in our own drive outside my house I get other car users beeping their horns, swearing at me to get out of their way. It is only wide enough in places for 1 car with nowhere to pass safely. You even have to be extra careful if walking up or down Churchhill as there are no footpaths.

Saying NO to these developments see reasons above.

Have you even been out to look at the area

Mrs V Gulliford

I noticed you have done during the LOCKDOWN !

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Vistry Homes Ltd

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sir or Madam,

Please find attached representations to the B&NES Local Plan Partial Updated consultation on behalf of Vistry Homes Ltd.

I would be grateful if you could confirm receipt.

Regards

Dan

Dan Washington BA(Hons) MTP MA (Urban Design) MRTPI

Director • Chartered Town Planner

Attachment included with response. Please contact to request to view

Respondent Warwick Sloss

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

To Whom it May Concern,

It has come to my attention that there is currently a consultation on moving a Housing Development Boundary, to include the sites known as RAD 25 and RAD 26.

As a local resident who would be adversely affected should this plan come into effect, I should like to submit my strong objection to it. My reasons for this objection are given here below.

1. RAD 25 and RAD 26 are Greenfield sites that are both being productively farmed. Farmland should not be built on.
2. The sites provide open space, strengthens existing landscape features and views to the open landscape. This area supports a wide range of wildlife, such as bats, deer, slow worms, hedgehogs, otters as well as a huge variety of birds, which would undoubtedly be adversely affected by this development, and many of which have protected status.
3. The road system will not be able to sustain further pressure generated by another housing development. Increased traffic would have a significant impact on traffic congestion in Writhlington at the 5-way junction, putting the safety of children who attend the 3 schools at risk. The A362 is already a busy road with hidden dips, access to/from a new development and the increased traffic would add significantly to safety concerns.

The 5-way junction of Frome Road/Knobsbury Lane/Manor Road/Old Road is dangerously congested and frequently gridlocked, particular at peak times and is extremely hazardous for drivers and pedestrians at peak times and regular traffic collisions occur, despite the newly installed speed camera and the pelican crossing. The safety of the students from the 3 schools, who are forced to navigate it, is already compromised. Additional traffic, generated by another housing development, will only exacerbate the problem. The recent development, Orchid Way, has already added further to congestion here.

The rejection of an application by BANES to build 160 houses in Writhlington in 2019 stated that the development would have a 'severe and cumulative effect' on the road system in Radstock. Some traffic from any development would inevitably use two single-track lanes that lead to Peasedown and Bath. These roads lead to 3t weight restriction over a very narrow bridge, and a blind 90-degree bend underneath the railway arch. They are prone to extreme water run-off, and in winter are often dangerously icy, causing accidents.

I have a particular interest in this since my house is on the single-track road known as The Combe and the levels of traffic have been increasing steadily over the twelve years that I have lived here. The nuisance caused by elevated levels of noise, danger and pollution is already severe, and more housing development would only increase this, since the road is the one of the main access routes to both of the proposed sites.

When I moved here the area was quiet and relatively free of traffic. With subsequent housing developments in Writhlington, Radstock and Peasedown, this road has become a 'rat run' for commuters. This will certainly have had a deleterious effect on the value of the property, as the flow of traffic is now almost constant.

4. Public transport is poor, commuters cannot use it to get to Bristol, Frome, Bath or beyond for a normal working day.

5. The Government, BANES and Radstock Councils have all declared a Climate Emergency. Any housing development must not result in out commuting, with additional vehicles on our roads adding to congestion and pollution. We should be reducing not increasing traffic on the roads.

6. The infrastructure will not support such a development with local services such as the doctor and dentist already stretched beyond capacity. Public transport is very poor, and due to the very hilly nature of the area it's inappropriate to suggest people could walk or cycle to work, shop or access local services.

7. In the past 3 years over 60 new houses have been built in Writhlington that has already placed significant pressure on our infrastructure.

8. There are Brownfield sites that have not been developed in the Somer Valley. These should be developed before Green fields are even considered.

9. Even with sustainable drainage there will be significant water run off with additional houses. Drainage on The Combe is already problematic. There are always potholes opening up, and the road is constantly eroded at the edges by running water.

Thank you for your kind attention on this matter.

Regards,

Warwick Sloss,

Respondent Wendy Gregory

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Once made, Neighbourhood Plans also form part of the statutory Development Plan and have the same legal status. I cannot find evidence of this being taken into account within this process. Good practice should seriously consider the status of Neighbourhood Plans, ideally showing respect and sensitivity of their content, to help inform reviews and updates. Proper consultation in advance, and in anticipation of updates which could produce conflict with existing Neighbourhood Plan policies, would help facilitate positive outcomes. Policies relating to the Climate and Nature Emergency, and the Environment, I agree the need for a partial update of the Plan, but feel that there have been a number of omissions involving policies regarding the Climate and Nature Emergency, which have been thoroughly detailed by our designated working party. They are detailed explicitly and I refer you to them. Moreover, they cannot, in my opinion be left until the New Local Plan

Policy PMP: RA2 Villages: I concur that this policy should be reviewed and would comment as follows: The designation of rural settlements to one of two categories, currently RA1 and RA2, is based on a list of local facilities. The Placemaking Plan then attaches one of two quotas to each and these, it considers, represent sustainable development. In the case of RA2 settlements such as ours, that figure is 1 – 15 dwellings and in our view, whilst that might be reasonable in some RA2 villages, it cannot be assumed to be the case. Whilst available facilities may be a useful starting point, this is often far too broad an approach to consider properly what is sustainable in individual villages. Whatever number is allocated to RA2 settlements, there are other factors that must be considered before a sustainable figure is determined for an individual village. These should include: Topography; Parking and Accessibility; Pedestrian Safety; Public Transport; Utilities and Services; Local Employment and most importantly, the impact in respect of the Climate and Nature Emergency. We also strongly question the assumption that every five years there will be an allocation of dwellings to all RA2 villages outside of the Green Belt. There must be a proven need for the type of development proposed. Even then, the level and density of any development in small villages should be consistent with their Parish Character Assessment. To avoid the sort of slow sprawl that is ruining many rural areas, this essential character must be protected, especially in AONBs. This also reflects Paragraph 122, d) of the Revised NPPF (National Planning Policy Framework).

Policy CS: CP5 Flood Risk Management: This policy, currently omitted, should be included in your review. When developers carry out a Flood Risk Assessment they typically only check against the Environment Agency flood risk from Rivers and Seas (i.e. flat area flooding). For communities on steep slopes, such as the Mendips, they will typically have the lowest risk from Rivers and Seas, but are particularly susceptible to Surface Water flash flooding. Please update this policy to also require the Flood Risk Assessment check to be done against the Environment Agency flood risk from Surface Water in the nearby vicinity as well, such that if either check shows an increased level of risk then this policy would escalate the requirements.

Policy CS: RA4 Rural Exception Sites: I would not want to see the wording of this policy changed.

Policy PMP: ST7 Parking Policy: This policy should be included and would comment as follows: Each community has very different needs in respect of parking standards. Many rural villages do not have a full range of local facilities accessible via public transport and a high proportion of residents need a vehicle in order to work. This can result in a higher than average level of car ownership per household which, in reality, will not be reduced by fewer off-road parking spaces. Those same villages often have very narrow medieval lanes that get easily blocked for farm, emergency and delivery vehicles if cars have to be parked on the street due to insufficient off-street parking in developments. For reasons such as this it is important to give flexibility to different communities to be able to tailor their own minimum off-street parking standards. An example of this happening in practice is in the Chew Valley Neighbourhood Plan policy HDE8b. Also, in these same rural communities it is very common for any garages to be used for storage or converted to living space and so not be available as a future off-street parking space. With an increasing number of households changing to electric or hybrid vehicles, this will not in itself have a negative impact in respect of the Climate and Nature Emergency. For these reasons, we advocate the following approach:

- Define parking standards in different spatial areas.
- Exclude garages

and review the number of parking spaces for different sized dwellings. • Facilitate the above by defining parking standards in a separate SPD (Supplementary Planning Document). The Updated Local Plan policy should then just refer to the SPD or any made Neighbourhood Plan. This will allow Neighbourhood Plans to be used to define parking standards for the needs of specific communities.

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

No Comment

Do you have any other specific observations to make on the Local Plan Partial Update?

Despite the CoVid pandemic, it is a council's moral duty when communicating with their residents to ensure that the process and language is accessible to all. There is no doubt at all that, although being guided by the Government directive to progress wit

What are your views on the new Draft Statement of Community Involvement?

The section on Neighbourhood Plans notes the Local Authority's legal duty to assist and advise in the preparation of new Neighbourhood Plans. However, the Commencement Document states that "In the light of the Partial Update some existing Neighbourhood P

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent West Harptree Parish Council

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please find attached Consultation response from West Harptree Parish Council.

Kind regards

Jan Burdge

Parish Clerk

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Whitchurch Village Parish Council

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please find response from Whitchurch Village Council attached.

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Whitcurch Village Council

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

See letter attached

Do you have any comments on the programme for the preparation of the Local Plan Partial Update?

See letter attached

Do you have any other specific observations to make on the Local Plan Partial Update?

See letter attached

What are your views on the new Draft Statement of Community Involvement?

See letter attached

Attachment included with response. Please contact to request to view

Respondent Widcombe Association

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Subject: Local Plan Partial Update

Dear Richard

Local Plan Partial Update – Response on behalf of the Widcombe Association

In response to the current consultation on the scope of this partial update of the Local Plan, I firstly should say that we welcome this approach in the light of the abandonment of the JSP, as there is a clear need for some policies to be reviewed more urgently than the time-frame involved in the preparation of a full new Local Plan. We also support in general the selection of policies which have been identified for review. However, we believe there are other policies or policy areas which in our view are equally in need of the more urgent approach and I set these out along with our reasoning below.

1 PMP: PCS1 Pollution and Nuisance – in light of the deferment of the introduction of CAZ and the recent acknowledgement of the threat to public health of air pollution, we believe this policy should be brought forward for serious reconsideration.

2 PMP: PCS3 Air Quality – for the reasons outlined above, this policy should be reviewed urgently at this time. The relationship between air quality and traffic and health is now much better understood and ideas such as road closures near schools at peak times to create safer environments for children should be explored.

3 CS:CP5 Flood Risk Management – in the light of the greater awareness of the Climate Change Emergency, this policy should be reviewed to ensure it is indeed up-to-date. Guidance on new porous surfacing of car parks and domestic driveways may need to be stronger. The recent report by the TCPA 'Rising to the Climate Crisis- A Guide for Local Planning Authorities on Planning for Climate Change offers some useful advice on flood risk and other issues.

4 CS: CP9 Affordable Housing – there has been a noticeable growth in the development of the types of housing (mainly PBSAs but also sheltered housing) which is especially lucrative partly because it avoids the requirement for inclusion of affordable housing, resulting in a significant deficit in AH provision in the city. This is an issue which requires urgently to be addressed and should not await the new LP. A clear policy is also needed urgently to limit the growth of PBSA development which create ghettos of transient populations – to focus on the need for new homes for families and young professionals in the city, which will also support our retail, leisure and other services.

5 PMP: RE7 Visitor Accommodation – it is noted that it is intended to clarify this policy through the new Local Plan, but we feel this should be dealt with at this time as there has been a noticeable increase in the loss of family accommodation in particular in Bath and a consequent hollowing-out of the residential community which is an essential part of the city's unique character. The number of hotel bedrooms in the city has exploded in recent years and it seems likely that the previous estimate of the need has been overtaken, especially so when the growth in Airbnb accommodation is added. We are hoping for government legislation to review and bring these under control, but local policies will also be needed. Closely allied to this is the urgent need to develop a suite of Tourism policies for the city, encompassing the nature of tourism, the control of traffic to enhance the experience, linked to alternative and innovative ways of getting people into and around the city, without the tour buses and coaches.

6 PMP: CP2 Centres and Retailing - Allied to RE7 above, there is an urgent need for a comprehensive raft of Tourism policies to be developed for the city encompassing the future of the retail, leisure and related businesses which are expected to undergo a major upheaval over the course of the coming months and years.

7 PMP: ST6 Park and Ride – the need for an eastern P&R site is clearly a long-standing issue which must be tackled at the earliest opportunity and not kicked into the long grass again. It must be part of the wider traffic and transport strategies to relieve the centre of our city of the congestion and air pollution and hand it

back to pedestrians as far as possible.

8 PMP: NE6 Trees and Woodland – this policy requires strengthening to protect our woodlands and trees and in particular to safeguard those on the slopes surrounding the city and most especially those on the skyline, which have in some places over recent years become depleted, to the considerable disfigurement of this important feature of this World Heritage City. There is a vital need to ensure that any trees lost, whether through storm damage, disease or illegal felling - or wilful vandalism, are replaced and replenished and to make provision for all opportunities to be taken for investment in new plantations in locations already exposed to such loss.

If you would like any further clarification on any of the points we have raised, please don't hesitate to let me know.

With kind regards

Jan Shepley
Widcombe Association

Respondent William Hamlen

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs,

I wish to take this opportunity to register my objections with you with regards to the possible development of 370 houses in Writhlington. The two sites are classified as RAD25 & RAD26.

My main concern and objection is with regards to the local road system. 370 houses would inevitably mean a huge increase in private vehicles using the road known as Manor Road, which due to the fact that most of the residents of Seaward Terrace have to park their cars outside of their houses and severely restrict the passage of traffic along Manor Road. Further to this at the top of Manor Road there is a 5 way junction with heavy traffic using the A361 Radstock/Frome. During the school start and finish times this becomes extremely congested and dangerous for children going to and from St Mary's school and Senior school. Added to this many of the children from Writhlington school have to travel by bus and the increase in traffic would make the exit either way from the junction more difficult.

During any construction of house there would be a large number of contractors vehicles having to gain access into the said fields along narrow roads not adequate for this purpose. Children from St Mary's school would be at risk whilst walking to and from school. At the bottom of Church Hill the road becomes even more restricted with a narrow bridge over the Radstock brook and a site of several accidents in the past caused by a blind 90degree bend under the old railway arch. This road becomes a rat run with traffic avoiding congestion in the centre of Radstock. Any increase in private cars due to the increase in families to the area proposed who have to travel out of the area for employment would inevitably lead to further accidents.

The local services infrastructure is inadequate at the present time and with no further development in making that any better would put intolerably pressure on those local services we now have. Public transport is poor which leads me back to my first objection of more traffic. I am lead to believe that under Government policy, BANES and Radstock Town Council have declared a Climate Emergency. The increase in traffic would lead to greater pollution and congestion. Is this a wise move on your part?

Surely it would be better to give consideration to the many Brownfield sites in and around the Radstock/Midsomer Norton area rather than developed prime agricultural Greenfield sites.

The fact that there is very little employment in the area people would have to travel further afield for employment making the cost of new housing less than attractive, leading to the already increase in houses that are standing empty.

Thank you,
Yours sincerely
William Hamlen

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent William Harper

Response Type: Online Form

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

I wrote to Wera Hobhouse about what is being done in BANES to help residents in terraced housing areas who want to switch to electric cars but who have no private parking space and no option for a personal charging point. Under 13b, I want you to include detailed policy on how you will implement green infrastructure in residential streets to help us switch to sustainable transport.

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Woodland Grove Community Group

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Dear Sirs

I made a submission yesterday from Woodland Grove Community Group.

A technical error came to light with the document, this has now been adjusted and the revised version is attached.

I would appreciate it if you could delete the previous version and replace it with this version, the file name has been modified to show "REV-1"

Sorry for any inconvenience

Regards

Alex Hansen

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Woodland Trust

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Good Morning,

Please find attached comments from the Woodland Trust in response to B&NES' Local Plan Partial Update Commencement consultation.

Please do get in touch if you'd like to discuss these comments further.

Best wishes,

Heather

Heather Elgar
Regional External Affairs Officer - South West

Attachment included with response. Please contact to request to view

Local Plan Partial Update

Launch Consultation (April 2020) – Comments

Respondent Writhlington Action Group

Response Type: Email

Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?

Please find attached objection on behalf of Writhlington Action Group (WAG) to the inclusion of sites RAD25 and RAD26 Writhlington, in BANES Local Plan

WAG has significant local support and last year a planning application to build houses in Writhlington on RAD26 resulted in approximately 234 written objections being sent to BANES from the community. This demonstrates the depth of opposition to possible developments in Writhlington.

Jane Evans

Chair of Writhlington Action Group (WAG)

Attachment included with response. Please contact to request to view