

Bath & North East Somerset's

Placemaking Plan

Launch and Options stages

Consultation Statement

Regulation 18

December 2015



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Overview

1. Introduction

- 1.1** This statement sets out the consultation and community involvement undertaken during the preparation of Bath and North East Somerset Council's Placemaking Plan Launch and Options documents. This is in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2** The Planning Regulations require that the Council must consult each of the statutory consultees, general consultation bodies, public and business community the local plan (i.e. the Placemaking Plan) and invite each of them to make representations on its scope and content.
- 1.3** This statement explains the consultation undertaken and details of who has been consulted; details of how they were consulted; and a summary of the issues raised and how those main issues have been addressed for the following two stages of public participation and consultation which took place under Regulation 18

2. About the Placemaking Plan

- 2.1** The purpose of the Placemaking Plan is to complement the strategic framework in the Core Strategy by setting out detailed development principles for identified development sites and other policies for managing development across Bath and North East Somerset.
- 2.2** The adopted Core Strategy forms part one of the Local Plan. The Placemaking Plan, as Part Two of the Local Plan, now needs to set out a robust and positive planning policy framework to promote and deliver high quality, sustainable, well located development supported by the timely provision of necessary infrastructure and to ensure the aims of national and local sustainable development agendas can be met. When adopted, the Placemaking Plan, together with the Core Strategy, will be used for determining planning applications in Bath and North East Somerset.

3. Consultation approach

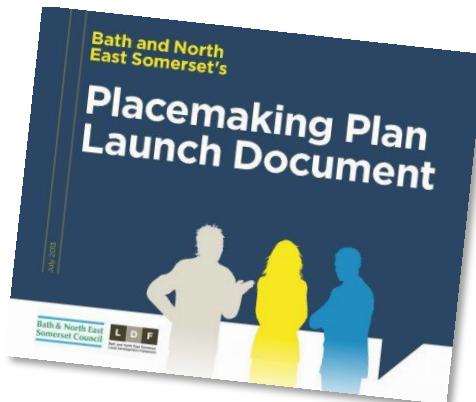
- 3.1** With the introduction of the Localism Act, communities are empowered more than ever before to help shape the future of development in their neighbourhoods. The Council attaches significant importance to working with local communities in planning and placemaking, and our local approach is set out in the Council's **Neighbourhood Planning Protocol** (Statement of Community Involvement).
- 3.2** The information set out in this consultation report demonstrates compliance with the Neighbourhood Planning Protocol methods of community involvement and outlines the consultation activities undertaken, who was consulted, and how they were consulted.



Launch consultation

4. Introduction

- 4.1** In order to stimulate discussion on the emerging Placemaking Plan the Council prepared a Launch document. The Launch document was agreed for consultation by the Council's Cabinet on 8th May 2013 and the consultation took place between the 25th July and 20th September 2013.
- 4.2** The Launch Document was presented as a discussion document, designed for community and stakeholder engagement and to generate the content for the options stage of the Placemaking Plan.
- 4.3** The primary function of the Launch Document is to spark debate and discussion about detailed planning issues that need to be resolved, and to produce the required research and evidence to ensure we end up with a robust plan.
- 4.4** The launch of the Placemaking Plan offered a timely opportunity for communities and the Council to work in partnership to shape neighbourhoods, and to produce a planning policy document that is locally specific. Ongoing engagement with Parish and Town Councils was accompanied by a period of more formal consultation on the Placemaking Plan Launch Document (details below).
- 4.5** The Launch document essentially follows the same format and order as the Core Strategy:
- Development Sites
 - Bath
 - Keynsham
 - Somer Valley
 - Rural Areas
 - Development Management Policies



5. Availability of documents

5.1 The Launch Document and links to the supporting material and other information were made publicly available at the nominated ‘Deposit Stations’ across the District, namely the main Council offices in Bath, Keynsham, and Midsomer Norton and all public libraries as well as the community library at Combe Hay (see paragraph 6.4 below). The Council’s website was the main means by which the consultation documents and supporting evidence were accessible.

6. Information on the Consultation

Notification mailout

6.1 Information about the consultation was issued prior to the start of the consultation period by email /letter on 23rd July 2013 to all those on the Local Development Framework mailing list which included statutory consultees and a range of other stakeholders. Whilst the mailout encouraged people to submit their comments electronically using the comments form provided, it was made clear that letters would also be accepted.

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Press release and coverage

6.2 A press release was issued which was picked up in local newspapers, newsletters and featured on other organisations’ websites together with Council publications, including:

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Local press

- ▶ Bath Echo
- ▶ Keynsham Voice
- ▶ Council’s Connect magazine
- ▶ In Contact - the Care Forum
- ▶ The Bath Chronicle
- ▶ Twerton Community News
- ▶ Westmoreland Community News
- ▶ Planning Policy Newsletter
- ▶ The Midsomer Norton, Radstock and District Journal

Websites

- ▶ Compton Dando Parish Council
- ▶ High Littleton Parish Council
- ▶ Charlcombe Parish Council
- ▶ Hallatrow Parish Council

- ▶ Hinton Blewett Parish Council
- ▶ Hinton Charterhouse Parish Council
- ▶ Monkton Combe Parish Council
- ▶ Priston Parish Council
- ▶ Saltford Parish Council
- ▶ Stoney Sutton Parish Council
- ▶ Timsbury Parish Council
- ▶ Bath Preservation Trust
- ▶ Virtual Museum of Bath

Printed Information

- 6.3** The Placemaking Plan Launch document together with other relevant information including details of the consultation and comments forms were placed in the nominated ‘deposit stations’. Whilst consultees were encouraged to view documents and submit comments electronically paper copies were made available if requested to ensure inclusivity.
- 6.4** The Launch document and comments forms together with an explanatory note were made available to view at the following deposit stations:
- One Stop Shop, Lewis House, Manvers Street, Bath BA1 1JG
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
 - Riverside, Temple Street, Keynsham BS31 1LA
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
 - The Hollies, High St, Midsomer Norton BA3 2DT
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
 - All libraries in Bath & North East Somerset. A list of all the libraries, including information on opening hours is available on the Council’s website at www.bathnes.gov.uk/libraries

Comment Form

- 6.5** The Council produced a Comment Form for those who wished to respond to the consultation. It included clear information on how to respond using the form. These were available in printed form at the ‘deposit stations’ and could be downloaded from the Council website:
www.bathnes.gov.uk/placemakingplan

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Council Website

- 6.6** A web page relating to the consultation could be accessed via links from the main Planning Policy webpage on the dedicated Placemaking Plan webpage where it was advertised as a News item at the start of the consultation.

6.7 The webpage set out the following information:

- An overview of the Placemaking Plan: setting on the strategic context for the Placemaking Plan and what the plan is seeking to achieve
- The Launch Document: explanation about this early stage of the plan preparation process, and that the Council was consulting on its proposed scope and content
- Programme: outlining the key milestones for the for the preparation of the Placemaking Plan as set out in the Local Development Scheme
- Consultation Details: how to respond, links to the consultation material including comments form and details of where hard copies of the consultation material could be viewed



6.8

A series of tweets were released via the Council's main twitter account [@bathnes](#) throughout the consultation period to achieve a mix of traditional media and digital in order to reach a wider audience.

Direct Contact Information

6.9

An email address and contact telephone number was provided on all the consultation material, mail-outs, and website for those who wanted to ask direct questions and seek further information.

7. Stakeholder consultation

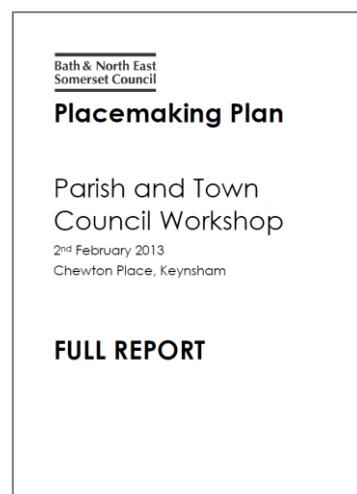
Parish & Town Councils Workshops

7.1

The Council ran a workshop on **Saturday 2nd February 2013** to start building a better understanding of how to deliver the Placemaking Plan collaboratively between Bath & North East Somerset Council and Parish and Town Councils.

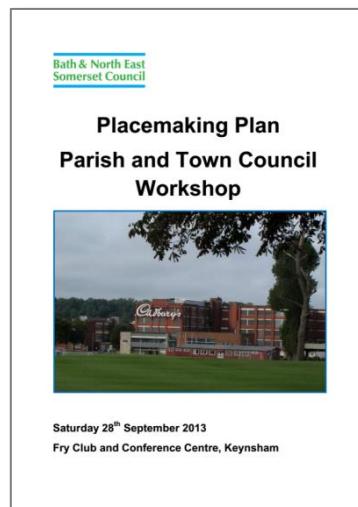
7.2

This initial Workshop introduced the Parish and Town Councils to the Placemaking Plan programme and they tested initial draft 'planning toolkits'. This session focused on just two of the practical DIY survey tools that can be used as part of the process of gathering evidence about a parish to define character and manage development:



Bath & North East Somerset Council
Placemaking Plan
Parish and Town Council Workshop
2nd February 2013
Chewton Place, Keynsham
FULL REPORT

- Survey Toolkit 1 - Landscape Character Assessment designed to assist communities examine and record the distinctive character of the landscape in their parish.
 - Survey Toolkit 2 – Sites Assessment Survey designed to help communities to examine and record key aspects of one of the sites suggested for development in and around their parish
- 7.3** More details on the outcome of the workshop, including links to supporting information, are included in the workshop report available on the Council's website.
- 7.4** A second Parish and Town Council Workshop was held on **Saturday 28th September 2013** in Keynsham. This Workshop was arranged by Bath and North East Somerset Council and facilitated by Place Studio to develop a collaborative approach to producing development management policies and site allocations for the emerging Placemaking Plan document.
- 7.5** The purpose of this Workshop was to test and gain feedback on revised draft 'Character Toolkits' and 'Site Assessment Toolkits' which would enable the Parish and Town Councils to input into the Placemaking Plan programme.
- 7.6** A summary of other ongoing engagement activities with the Town and Parish Councils is outlined in Appendix 1.



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Bath City Conference

- 7.7** This is an Annual Conference organised by local residents, businesses and the Council aimed at giving local people who live, work and run local businesses or charity, voluntary sector organisations in Bath the chance to get involved and have their say on the things that are important to them. It provided an opportunity



for the Council to report back on what has been delivered since the last Bath City Conference and organised as a drop in/open event which took place on **30th April 2014**.

- 7.8** The Planning Policy team used this opportunity to provide information on the preparation of the Placemaking Plan. This took the form of a staffed display to raise the profile and purpose of the Placemaking Plan.

Bath Enterprise Area Masterplan

- 7.9** Within the context of the Core Strategy the emerging Placemaking Plan includes the preparation of a spatial framework for the Bath Enterprise Area. This is necessary because there are a number of major development opportunities within the Enterprise Area which will help to deliver the Council's aspirations in relation to creating an environment that will attract businesses and employment opportunities. In addition these sites will help to bring forward essential infrastructure such as schools, flood mitigation and social housing for local communities. As the development of these sites is a Council priority, a masterplan was developed to feed into and inform the emerging Placemaking Options. This included a series of stakeholder events between November 2013 and August 2014 as summarised in Appendix 1. The key issues and comments emerging from these sessions and how they have been addressed are summarised below. These were used to inform the design principles for the sites included in the Options document.

Key issues	Response
Form and appearance should be added to the overall principles.	Greater prominence to form and appearance have been included throughout, in particular into the key site principles.
Sustainability should feature more prominently.	Sustainable infrastructure section of evidence base has been completed, with findings translated into the Masterplan Vision report.
Recognise the role of ENTERPRISE in Enterprise Area. Re-emphasise this.	Working Life – one of the 5 themes, has been elevated to be the first of the five themes, and text amended to reflect relative priority.
Education and Training should also feature.	Themes amended.
Opportunities needed for Renewable Energy.	Sustainable infrastructure section of evidence base has been completed, with findings translated into the Masterplan Vision Report.
Promote exciting bridges (at several opportunities).	Bridge analysis has informed recommendations for additional bridging

	points all illustrated within the Vision report, and costed/explained within the Delivery Strategy.
Use connections and linkages to promote wildlife.	Key ecological nodes have been identified. This is now reinforced, in summary, within the Vision Report, building on the extensive evidence base from Biodiversity By Design
Culture and Heritage: allow for a Museum, Concert Hall and Library.	Scope for such uses has never been ruled out. Enhanced opportunities now identified, e.g. within BWRE.
Deliver the Public Realm and Movement Strategy.	Enhanced cross referencing of the wealth of studies and report which underpin the Masterplan (Bath Story, City Identity, PRMS work)
Flood prevention projects and interventions are key.	Enhanced and detailed information on Innovation Quay, incorporating Bath Quays Waterside flood alleviation project.
Projects in Manvers Street and Innovation Quay are key opportunities for delivery.	Additional detail for these sites is included, relative to other sites.
Use transport projects to grow from the core outwards and to get people around. Integrate with and Deliver Bath Transport Strategy	Close alignment with the Bath Transport Strategy throughout. Additional cross-referencing to the Bath Transport Strategy has been included with reference to questions around Innovation Quay.
<u>Manvers Street will have....:</u> Public space. Mixed uses. Riverside access. Reduced congestion on Duke St for pedestrians/cyclists? PRMS implementation. Heights which match shoulder height. A Bridge? ...nice to have but not essential. Prioritised eco-design.	Access to riverside is promoted. Demonstration of the importance of views and vistas included. The area vision recognises importance of pedestrian and human scale. Eco and sustainable design is promoted throughout the Masterplan.
<u>North & South Quays will contain....:</u> An Innovation Centre. Re-prioritised Churchill Bridge and roads for pedestrians/cyclists. A BQW project with improved movement and access. Essential to Quays, a bridge of exceptional design. BQN buildings with a more contemporary design.	Additional detail provided ion uses, including Innovation Centre a part of vision. Reference to BQW project, as enabling and preparatory works is enhanced. The importance of the bridge is reflected in the Vision Report. Links to Bath Transport Strategy for car and coach parking requirements.

A solution to coach and car parking – where are these going?

BWR(E)/Green Park High Street will contain...:

Fine grained building layout...smaller scale.
A Civic Hub is a good idea... but is it too far out?
Improved junctions for pedestrians/ cyclists.
Improved access to, and through, the area.
A useable Pinesway area.
Changes to Norfolk Crescent not impacting on the river edges.

Masterplan Vision report emphasises the need to address Pinesway area;
Civic Hub opportunity identified. There is a need for this – where else could it go? The indication within the Vision report represents an opportunity.

Additional detail around uses, options and the preferred layout has been explained through the Vision report.

Vision Report addresses the area at a high level, without compromising specific areas e.g. Norfolk Crescent.

Roseberry Place will contain...:

An exciting new/reopened bridge.
Improved cycle connections to Bath Riverside, Two Tunnels, NCN.
Some attractive riverside access and uses.
Be innovative and brave: must have the wow factor! Be creative like Nash et al.

Bridge opportunity has been seized and articulated through the Vision Report.
Important links and other supporting measures for enhanced cycling connections are included.
Opportunities for river access are enhanced and promoted.

Bath Press will provide...:

At least an element of jobs.
An opportunity to re-use important historic buildings.
Better links through the Bath Press site to surrounding areas.

The Masterplan continues to promote balance of uses, including employment.
Importance of heritage is recognised and emphasised.
The Vision report explains how the site can be better connected to its surrounding area.

Production Quarter

Improve spaces and safe cycling along the river.
Provide facilities for cycling: create a transport hub e.g. facilities, parking, changing.
Improve linkages east and west/ north and south.
Seize the opportunity at Weston Lock and Island.
Increase wildlife interaction: interpretation boards/ guided walk.
Improve river edges.

Connections and cycling improvements play a big role in Production Quarter opportunities. These are detailed in the Vision Report.

The long-term opportunity of Weston Island is fully recognised. Short-term use to enable other Enterprise Area projects is also discussed.

Enhanced ecology and wildlife areas are promoted.

8. Representations on the Launch document

Consultation feedback

- 8.1** The consultation generated around 484 representations. The majority of the comments were broadly supportive of the approach to be taken as regards the sites specific elements and the development management policies although a number, principally developers, express concern that the Placemaking Plan is being advanced before the Core Strategy has been found sound. Many made constructive suggestions on how the site principles and policies for managing development can be advanced in a positive and informed manner. There were considerably more comments on the sites than the development management policy areas.
- 8.2** A Schedule of comments received can be viewed on the Council's website and accessed via this link:
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/launch_doc_socs.pdf

Summary of main points raised

- 8.3** The main points arising from the responses to the Launch consultation are summarised in Appendix 2 and were key to shaping the next stage in the Placemaking Plan process: the generation of options.

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Options consultation

9. Introduction

9.1 The Placemaking Plan Options document represented a stepping stone in the preparation of the Draft Plan in 2015.

Continuing the same format as the Launch document, the Options document set out the vision and design principles for proposed key development sites and the new set of updated planning policies. Its purpose was to:

- identify options for sites to be allocated for development for housing, employment and other uses to help meet development needs identified in the Core Strategy
- review and update the development management policies used in the determination of planning applications
- ensure the delivery of key development sites could be facilitated
- safeguard and enhance the quality and diversity of places in the District including the protection of valued assets and identifying opportunities for change
- provide the opportunity to work together with local communities to review the Housing Development Boundaries.

9.2 In preparing the Plan the Council is required to test reasonable alternatives. This document outlined the Council's view of the reasonable alternatives or 'options' for site allocations and development management policies.

9.3 The Options document was approved for consultation by the Council's Cabinet on 12th November 2014. Comments were invited on the options between 27th November 2014 and 30th January 2015.



10. Availability of documents

10.1 The Council's website was the main means by which the consultation documents and supporting evidence were accessible. As with the Launch document, the Options document, together with an explanatory note, flyer advertising drop-in events and comments forms were made available to view at the following deposit stations along with links to the supporting material and other information:

- One Stop Shop, Lewis House, Manvers Street, Bath BA1 1JG
Monday – Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
- One Stop Shop, Keynsham Civic Centre, Market Walk, Keynsham, BS31 1FS
Monday – Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)

- The Hollies, High St, Midsomer Norton BA3 2DT
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
- All libraries in Bath & North East Somerset. A list of all the libraries, including information on opening hours was available on the Council's website at www.bathnes.gov.uk/libraries

11. Information on the Consultation

Notification mailout

11.1 Information about the consultation was issued prior to the start of the consultation period by email /letter on 26th November 2014 to all those on the Local Development Framework mailing list including statutory consultees and a range of other stakeholders. The mailout encouraged people to submit their comments online or electronically using the comments form provided. It was also made clear that letters would be accepted.

11.2 The Parish and Town Councils were mailed separately with the same information but with a request to display posters advertising the consultation in their area. In addition the Council offered to prepare an Action Pack designed for use by Parish or Town Councils should they wish to hold their own Placemaking Plan consultation event. This would include a set of consultation documents, comments forms, a supply of posters and postcards to disseminate in the locality to advertise the Council-led drop-in sessions plus display material relevant to the locality. This offer was taken up by Batheaston and Timsbury Parish Councils (see below for feedback from these events)

Press release and coverage

11.3 A press release was issued which was picked up in local newspapers, newsletters and featured on other organisations' websites together with Council publications, including:

Local press

- ▶ The Bath Chronicle
- ▶ Bath Echo
- ▶ Keynsham Voice
- ▶ Council's Connect magazine
- ▶ The Midsomer Norton, Radstock and District Journal
- ▶ The Week In
- ▶ Somerset Guardian
- ▶ Keynsham Voice
- ▶ Chew Valley Gazette
- ▶ Bristol Evening Post

Websites

- ▶ Transition Bath
- ▶ Batheaston Parish Council
- ▶ Bathampton Parish Council
- ▶ Peasedown St John Parish Council
- ▶ Priston Parish Council
- ▶ Publow with Pensford Parish Council
- ▶ Stanton Drew Parish Council
- ▶ Stowey Sutton Parish Council
- ▶ Temple Cloud Parish Council
- ▶ Timsbury Parish Council
- ▶ Ubley Parish Council
- ▶ Bath Preservation Trust
- ▶ The Virtual Museum of Bath
- ▶ Bathwick Liberal Democrats

Printed Information

11.4 The Placemaking Plan Options together with other relevant information including details of the consultation and comments forms were placed in the nominated ‘deposit stations’. Whilst consultees were encouraged to view documents and submit comments electronically, paper copies were made available if requested to ensure inclusivity.

11.5 Additional publicity material was produced alongside this document to help explain the role of the Placemaking Plan, to highlight the main issues and to provide details of the consultation:

- Postcards and flyers to advertise the times and locations of the drop in sessions
- 29 Display boards for the drop in sessions
- A3 size summary leaflets with the display content (see also paragraph 12.3 below)

11.6 Copies of the postcards and posters were sent to all libraries in the District and to Town and Parish Councils for display on local notice boards and the key Council offices in Bath, Keynsham and Midsomer Norton. In addition to this leaflets were distributed were distributed at meetings and at events.

Comment Form

11.7 Although respondents were encouraged to respond on-line, the Council produced a Comment Form for those who wished to respond to the consultation. It included clear information on how to respond using the form. These were available in printed form at the ‘deposit stations’ and could be downloaded from the Council website: www.bathnes.gov.uk/placemakingplan

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Council Website

- 11.8** A dedicated web page was created for the Option consultation which could be accessed via links from the main Planning Policy webpage on the dedicated Placemaking Plan webpage where it was advertised as a News item at the start of the consultation.
- An overview of the Placemaking Plan: setting out the vision and design principles for key development sites and a new set of updated planning policies
 - The Options document: explanation about this stage in the preparation of the Placemaking Plan, that it was an important exploratory stage in the preparation of planning policy. It also allows the Council to consult thoroughly on a range of potential options or scenarios, or in planning speak, ‘reasonable alternative options’.
 - Consultation Details: how to respond, links to the consultation material including comments form and details of where hard copies of the consultation material could be viewed
 - Next stage: explained that the comments received in response to the Options consultation would be used to inform the next stage of the Placemaking Plan: the Draft Plan.



Twitter

- 11.9** A series of tweets were released via the Council’s main twitter account [@bathnes](#) throughout the consultation period to achieve a mix of traditional media and digital in order to reach a wider audience. These were monitored using HootSuite and were used principally to advertise each of the consultation information events.

Direct Contact Information

- 11.10** An email address and contact telephone number was provided on all the consultation material, mail-outs, and website for those who wanted to ask direct questions and seek further information.

12. Stakeholder consultation

- 12.1** The Council held a series of drop-in events for the general public and interested stakeholders between November 2014 and January 2015 where officers were available to discuss the Placemaking Plan. The events took place at various locations across Bath & North East Somerset including the three principle urban areas of Bath, Keynsham and Midsomer Norton.

Date	Venue	Time
28 November 2014	Midsomer Norton, Town Hall	4 – 8 p.m.
4 December 2014	Radstock, Methodist Church Hall	4 – 8 p.m.
8 December 2014	Keynsham, One Stop Shop	4 – 8 p.m.
10 December 2014	Chew Magna, Millennium Hall	4 – 8 p.m.
7 January 2015	Bathampton, Village Hall	4 – 8 p.m.
8 January 2015	Bath, Central Library	4 – 8 p.m.
12 January 2015	Temple Cloud, Village Hall	4 – 8 p.m.
13 January 2015	Bath, Central Library	4 – 8 p.m.
15 January 2015	Westfield, Radstock College	4 – 8 p.m.

- 12.2** These events were advertised through the mailout, local press, Council News, the website and ebulletin/local networks as well as via the distribution of flyers and postcards and the use of Twitter.
- 12.3** Comprehensive and location tailored display material was produced for each event which could be reproduced as a series of A3 summary leaflets and could also be accessed and downloaded from the Council's website (hyperlinked below):
- The Consultation Process (0.3 MB)
 - Development Management Policies (0.4 MB)
 - Bath (6.1 MB)
 - Bathampton (2.7 MB)
 - Batheaston (2.7 MB)
 - Compton Martin (2.5 MB)
 - East Harptree (1.2 MB)
 - Hallatrow (1.6 MB)
 - Hinton Blewett (0.4 MB)
 - Keynsham (1.6 MB)
 - Midsomer Norton (1.5 MB)
 - Paulton (0.6 MB)
 - Radstock (1.3 MB)
 - Temple Cloud (1.6 MB)
 - Temple Cloud (2.5 MB)
 - Timsbury (4.6 MB)
 - Westfield (0.6 MB)
 - West Harptree (1.2 MB)
- 12.4** A record of the main issues raised at the Placemaking Plan Options consultation events are summarised below.

Midsomer Norton Town Hall - 28th November 2014 (4pm - 8pm) and 6th December 2014 (9am - 1pm)

This formed part of the Midsomer Neighbourhood Plan consultation event so some comments will relate partly to the Neighbourhood Plan.

50 attendees

Summary of key issues raised

- The use of Monger lane as a cut through to Peasedown St John therefore avoiding Radstock.
- Welcome the emphasis on housing design and provision but really need to ensure there is affordable housing especially for young people.
- Brewery at Stones Cross should be demolished to make room for newer buildings and there should be a halt on housing development in the local area.
- Present infrastructure cannot support anymore new houses in the area.
- Concern over traffic impact on Wheelers Road with new development of 35 houses as no highway condition on 140 more car movements through the only access to Radstock Road.
- Impressed by the proposed plan and reassured that potential development is to be on brownfield sites. The protection of the housing development boundary is supported.
- The provision of affordable housing to keep both younger people and older 'downsizers' in the area.
- Clear to see how the green spaces between the neighbouring villages/towns are being eroded. Midsomer Norton needs to keep its own identity from Radstock and Paulton. Therefore, essential to ensure green spaces between settlements are kept safe from further development.
- Not so much social housing, the town need people at work.
- Should be a requirement to work with Mendip District Council in connection with their Site Allocations Part 2 Plan.
- Wrong for the Neighbourhood Plan to ignore the possibility further development to the south of the town and this emerging Placemaking Plan. Great care needs to be given to the relative timing of this and the Placemaking Plan will inevitably have to have regard to up-dated overall housing requirements arising from the long anticipated Strategic Housing Market Assessment for the West of England.
- The Placemaking Plan seems to concentrate on a small number of brown-field sites. These are notoriously difficult to redevelop and brown-field sites within the urban area should be protected at least in part for employment uses and the Neighbourhood Plan should acknowledge the potential for growth onto Greenfield sites. Shortage of assisted living accommodation in Midsomer Norton for people to buy. Small flats with a kitchen facility and also communal areas. Suitable for people living alone.
- Excellent plan but: No proposals for actual location of housing development.
- With so many new houses being built, the infrastructure e.g. schools, GP Surgeries are

under strain. Provision needs improvement.

- It would be wrong to put houses adjacent to the College. Planned increased in housing will create need for more and larger education facilities - including sports grounds.
- Pleased to see that a plan is being put in place. It is essential to stop opportunist development by outsiders to our detriment.
- Fully support the preservation of green space between our towns and villages, e.g. The Boxbury Hill site must be protected.
- Need good quality apartments, maisonettes etc., 2-3 bedrooms, available to residents of MSN so that family houses etc. can be released on to the market, bringing footfall on to High Street.
- South Road, possible 50-100 houses for families could come onto the market hopefully creating a feeling good factor to the town.

Radstock, Methodist Church Hall - 4th December 2014 (4pm - 8pm)

4 attendees

Summary of key issues raised

- Importance of maintaining heritage assets within the town – must ensure new development respects this context
- If the library becomes available for development in the future the site should be redeveloped with a building more befitting of context/important location
- Radstock-Frome railway should be re-opened if possible, important to ensure NRR development does not prejudice this (current planning permission does)
- Need to encourage/provide for economic development & additional jobs in the Somer Valley and specifically in Radstock – allocations should not be just for residential development
- Queried how well the event was publicised

Keynsham, One Stop Shop - 8th December 2014 (4pm - 8pm)

29 attendees

Summary of key issues raised

- Suggest adding 'Hawkswell' and the 'Paddock' by the church as a Local Green Space
- Concerns around the lack of car parking in the town centre and loss of parking at Ashton Way (even temporarily)
- Ashton Way development should go ahead but only if it includes the Scout's land (and ideally Millard House). Site shown in the Options Document is not big enough.
- Car parking needed!
- Waste site/employment allocation relationship and land assembly
- Suggested use of Nursery Site (currently used as a car park accessed via Station Road

car park) as a site to relocate Scout Hall to.

- Suggestion that High Street be made one way to improve character for shops and pedestrians
- Consultation event poorly advertised
- Not easy to access the building after library hours (not clear)

Chew Magna Millennium Hall - 10th December 2014 (4pm - 8pm)

27 attendees

Summary of key issues raised

- HDB review process queried
- Implications of Green Belt policy at Chew Magna - infill opportunities
- Comments on the East Harptree housing allocation (SR6) - concerns around ecological interests, highway impact and street lighting.
- Stanton Drew Neighbourhood advice
- Policy approach for Pensford
- SuDS to address Chew Magna following and Chew Magna Neighbourhood Plan
- Policies RE2, RE4
- CIL/Planning Obligations
- Missed opportunities to include / identify options for affordable housing delivery.

Bathampton Village Hall (small room) - 7th January 2015 (4pm - 8pm)

12 attendees

Summary of key issues raised

- Bathampton – will there be Local Green Space consultation with landowners as part of Placemaking Plan process? Parish Council can contact landowners and are encouraged to do so
- Bathampton - Local Green Space designation boundary (GR17) should be amended to include the entire field as per the Parish Council submission
- Batheaston Park & Ride - queries about next steps, process and timescales
- Queries about Jewsons site and Park & Ride in the Green Belt
- Support for Local Green Space Designation - how to articulate this
- Venue and facilities good, accessible with parking

Bath Central Library - 8th January 2015 (4pm - 8pm)

15 attendees

Summary of key issues raised

- The discussions tended to focus on development sites within the city centre and the

Enterprise Area. There was widespread support for the development of these sites, ensuring that they contribute to the enhancement of the qualities of the city.

- The importance of raising design quality in the city, of this being recognised corporately, and establishing the proposed 'design values' for Bath was discussed.
- Our ability to deliver on our policy aspirations was raised, highlighting the occasional disconnect between policy and development management decisions, particularly in relation to design.
- Student accommodation was mentioned by several attendees with discussions focussed on the number of planning applications coming forward for development, and on our ability to control them.
- Queries over some of the different approaches taken in the Placemaking Plan to what is happening with Council owned sites or projects, for example in relation to the Colonnades planning application. The Council should be clearer about its aspirations.
- Traffic issues, such as air quality, congestion, and Park and Rides were raised as areas of concern.

Timsbury, Conygre Hall - 10th January 2015 (9.30am - 3pm)

This event was organised by Timsbury Parish Council and attended by two Planning Officers to assist in responding to queries.

300 attendees

Summary of key issues

- The highways issues on North Road and on South Road were raised
- Traffic and the need for better walkways to the shops and community facilities
- The doctors surgery is at capacity and has no-where to expand
- The loss of the public houses was raised
- The impact on the conservation area if SR13 is developed
- It was raised that the village hall and fields should be redeveloped and the hall relocated to the school playing field
- Questions were raised over the redevelopment of the school site for housing and the relocation of the primary school-is it really achievable or necessary?
- The issue of the loss of a green space (Site SR13) was raised
- The impact on North Road if the Wheelers Blockworks site (SR14) is developed was questioned
- Questions were asked over the minimum distance from trees to the proposed development on SR15 and where the arboricultural report could be viewed
- Questions were asked about the ecological impact of developing site SR13
- There were questions raised about a potential roundabout to allow access into the SR15 development and the impact that this would have on the North Road
- Questions were raised with regards to the potential access onto SR13 and if it is

achievable

- Questions were raised with regards to the process and how it was handled by the parish council
- Questions were raised with regards to the need to move the school
- The suitability of SR13 was raised with regards to the impact on the highways and on the landscape and the historic Ha, Ha
- The suitability of SR15 was raised with regards to the impact on North Road and on the landscape
- The issue of cars parking on North Road was raised and the negative impacts especially at school pick up or drop off times
- Issues were raised with regards to the local green space designations and why certain sites had been put forward
- Questions were raised with regards to the SHLAA and how sites have been added over the years
- The impact on the residential properties and the school if SR15 was developed was raised

Temple Cloud, Village Hall - 12th January 2015 (4pm - 8pm)

45 attendees

Summary of key issues raised

- Access from the proposed allocations in Temple Cloud onto the A37 was raised at the consultation. A suggestion was made that a new signalised access be created onto the A37 and that the existing access via Temple Inn Lane be blocked off. The new access would need to be suitable to allow access for HGV traffic as Temple Inn Lane currently acts as a route to the Trident Industrial Estate via Marsh Lane.
- The removal of the bypass for Temple Cloud was raised.
- A number of questions in relation to East Harptree. Identified sites are for schemes of 4 to 9 dwellings. These will only generate high end dwellings – out of reach of ordinary people. Therefore this housing growth will only serve to bring people in from outside of B&NES. How is this actually helping B&NES?
- No opportunity for affordable housing
- Apparent lack of liaison between Parish Council and parishioners about the Placemaking Plan.
- A number of questions in relation to Temple Cloud. How can Parish Council ensure the affordable dwellings are not all occupied by single mothers, benefit dependents, those with social problems or those so desperate for affordable housing they will apply for housing in Temple Cloud, even though they are totally unprepared for rural life.
- Do not want high numbers of one bed affordable dwellings – despite what Housing Register shows. This is not what village needs.

- Need to ensure all housing is designed to cope with later life
- Market housing should include one & two bed downsizing options for local people
- Traffic impact of SR23 or SR24 if they are developed and the impact on the A37.
- Questions were raised about the potential appeal on Temple Inn Lane and the impact on the Temple Inn Lane junction.
- Questions were raised about the East Harptree process of allocating sites for development and how the parish council identified the three potential sites.
- The highways impact of site SR6 was raised along with ecology and the flooding impact of any proposed development.
- Questions were raised over the suitability of green space GR1 and if it fulfils the criteria of the local green space designation.
- Traffic and transport on the A37 and the knock on effect of any additional sites.
- Concerns were raised about the Placemaking Plan process in High Littleton Parish and how the Placemaking plan assessments were conducted.
- The issue of Publow having additional housing in the future was raised.
- There were concerns that Stanton Drew's development opportunities were constrained by the Green Belt.

Bath Central Library - 13th January 2015 (4pm - 8pm)

12 attendees

Summary of key issues raised

- Much discussion on development sites within the city centre and the Enterprise Area. There was widespread support for the development of these sites, ensuring that they contribute to the enhancement of the qualities of the city.
- Public realm issues, opportunities to make the most of public spaces in the city centre.
- Discussions over the need to more strongly reinforce the importance of green space in the Placemaking Plan.
- The expansion of the Universities and the impact on the delivery of other Council objectives.
- Forget the rugby stadium on the Rec, it could be built on Lambridge instead. Instead there is potential for the Rec to be similar to the Jardin des Tuileries in Paris.

Westfield, Radstock College - 15th January 2015 (4pm - 8pm)

60 attendees

Summary of key issues raised

- Felt this was a poorly advertised event
- A need for warden-controlled homes linked to care homes so that those with big house can down size.

- Remember to include the area (size) for each site in the Placemaking Plan
- Great concern about the loss of any further open space in the Westfield area including the college site.
- Concern that the trees fronting the road at Radstock College could be lost - can we give them further protection (TPO)?
- Traffic generation from the college and impact on the A367 if developed for housing is of great concern
- Land at Old Mills (proposed allocation) is not available.
- No more housing as this is gradually eroding any remaining green space
- Query whether the baseline ecological baseline information is sufficiently up to date and robustly surveyed.
- St Peter's Factory site - more retail/employment uses and less housing.

Batheaston, Village Hall - 23rd January 2015 (3pm-5pm)

This event was organised by Batheaston Parish Council and attended by a Planning Officer to assist in responding to queries.

45 attendees

Summary of key issues raised

- Inquiries were made with regards who owns the land which is adjacent to the car showroom which is adjacent to the river
- Questions were raised about potential funding opportunities for the redevelopment of the toilet block into a café area
- It was asked if the Tower Hill site in Batheaston is greenfield/Green Belt or if it is part brownfield in the Green Belt
- Questions were raised about who owns the hard court play area next to the potential site SR16
- Concerns were raised over the impact of developing SR16 in terms of the loss of car parking space, the impact of the flood lights and potential noise on development (if the hard court area is not included in the proposed site layout)
- Questions were raised about the Community Infrastructure Levy
- It was raised that the Placemaking Plan should have policies that relate to the holiday lets-mainly about developing criterion for converting a house into a holiday let
- It was stated that the primary school can be extended on the land to the east of the school which would include the brook
- Questions were asked about the Local Green Space Designation
- There are only limited green spaces in Batheaston and there are only limited leisure facilities
- Parking implications of the loss of garages

13. Representations on the Options document

Consultation feedback

- 13.1** The consultation of the Options document generated just under 2,000 representations.
- 13.2** Major issues to be addressed included:
- Universities expressed an aspiration for greater expansion than set out in Core Strategy which has implications for the future policy approach for Bath
 - English Heritage, whilst supporting the Placemaking Plan approach was keen to understand evidence and be involved in future work on the Bath Enterprise Area sites
 - concerns around Transport/Air Quality impact of development and need for interventions for Bath e.g. Park & Ride
 - Ashton Way – concerns around redevelopment for Leisure Centre
 - Timsbury – division in village between two development sites (Lansdown View vs Southlands Drive)
- 13.3** A Schedule of comments received can be viewed on the Council's website and accessed via this link:
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/pmp_options_schedule_of_comments.pdf

Summary of main issues raised

- 13.4** The main issues arising from the responses to the Options consultation are summarised in Appendix 4 together with the Council's initial response.

Appx 4
page 119

Sent on
23 July
2013

Text for mailout for Placemaking Plan Launch Document - July 2013

Bath and North East Somerset Local Development Framework: Placemaking Plan

Invitation to comment on the Placemaking Plan Launch Document

We are writing to inform you that Bath and North East Somerset's Placemaking Plan Launch Document has now been published for consultation.

The Placemaking Plan, once adopted, will complement the strategic framework in the Core Strategy by setting out detailed development principles for identified development sites and other policies for managing development across Bath and North East Somerset.

The primary purpose of the Launch Document is to spark debate and discussion about detailed planning issues that need to be resolved. This initial stage in the preparation of the Placemaking Plan provides the catalyst to work with local communities and others involved in the development process. The Launch Document is presented as a discussion document, designed for community and stakeholder engagement and to generate the content for the next stage of the Placemaking Plan preparation.

This is the chance to comment on the issues and opportunities for key development sites and suggested planning policy framework for considering planning applications in Bath and North East Somerset up to 2029. You are invited to comment on the proposed scope and content of the plan and to use the discussion points and issues highlighted in the Launch Document as a basis for your response on the development sites and policy areas.

Consultation Details

The Placemaking Plan Launch Document and Comments Form are available on the Council's website www.bathnes.gov.uk/placemakingplan. The consultation documents can also be viewed at the following locations during opening hours:

- Council offices
 - The One Stop Shop, Manvers Street, Bath, BA1 1JG
 - The Hollies, Midsomer Norton, Bath, BA3 2DP
 - Riverside, Temple Street, Keynsham, Bristol, BS31 1LA
- At all public libraries in the District, including the mobile libraries

If you wish to make comments you are strongly encouraged to use the [Comments Form \(click here to download the form\)](#) and send it by email to planning_policy@bathnes.gov.uk.

Please ensure your comments reach us no later than 5pm on **Friday, 20th September 2013** and note that anonymous comments cannot be accepted. Please also note that your name and comments will be made publicly available, but your contact details will not.

Stakeholder engagement

As the Launch Document has been prepared with collaboration in mind a programme of collaboration with the different communities and stakeholders will take place in the Autumn 2013. Details of these events will be posted on the Council's website www.bathnes.gov.uk/placemakingplan.

Preparation timetable

Please note that the timetable for the preparation of the Placemaking Plan may be affected by the outcome of the Core Strategy Examination Hearings which will resume in September 2013. Further updates in relation to the Core Strategy Examination will be published on the Examination webpage <http://www.bathnes.gov.uk/services/planning-and-building-control/planning-policy/core-strategy-examination>. Updated information on the Placemaking Plan timetable will made available on the Placemaking Plan webpage www.bathnes.gov.uk/placemakingplan.

Do you wish to remain on our mailing list?

The mailing list contains the names and contact details of those who have made comments during previous consultations, or of those who have contacted us requesting to be kept informed of future planning documents.

We are asking everyone on our Planning Policy Mailing List if they wish to continue to receive information on the Placemaking Plan. Please email us at planning_policy@bathnes.gov.uk to let us know. If we do not hear from you **by 20th September 2013** we will assume that you no longer wish to be contacted with regard to the Placemaking Plan.

If possible **please provide an email address by which we can contact you**, this is our preferred method of contact as it is the quickest and most cost effective method.

Further queries

If you have any questions, please contact the Planning Policy team by emailing planning_policy@bathnes.gov.uk or telephoning 01225 477548.

Yours sincerely,



David Trigwell

Divisional Director Planning and Transport Development

Text for mailout to Parish and Town Councils

Sent on
23 July
2013

Bath and North East Somerset Local Development Framework: Placemaking Plan

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The primary purpose of the Launch Document is to spark debate and discussion about detailed planning issues that need to be resolved. This initial stage in the preparation of the Placemaking Plan provides the catalyst to work with local communities and others involved in the development process. The Launch Document is presented as a discussion document, designed for community and stakeholder engagement and to generate the content for the next stage of the Placemaking Plan preparation.

This is the chance to comment on the issues and opportunities for key development sites and suggested planning policy framework for considering planning applications in Bath and North East Somerset up to 2029. You are invited to comment on the proposed scope and content of the plan and to use the discussion points and issues highlighted in the Launch Document as a basis for your response on the development sites and policy areas.

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- At all public libraries in the District, including the mobile libraries

If you wish to make comments you are strongly encouraged to use the [Comments Form \(click here to download the form\)](#) and send it by email to planning_policy@bathnes.gov.uk.

Please ensure your comments reach us no later than 5pm on **Friday, 20th September 2013** and note that anonymous comments cannot be accepted. Please also note that your name and comments will be made publicly available, but your contact details will not.

Stakeholder engagement

APPENDIX 1

As the Launch Document has been prepared with collaboration in mind a programme of collaboration with the different communities and stakeholders will take place in the Autumn 2013. Details of these events will be posted on the Council's website www.bathnes.gov.uk/placemakingplan.

Parish and Town Councils will be invited to facilitate the production of the Placemaking Plan evidence base through the Autumn consultation programme. By working alongside Parish and Town Councils in preparing the evidence base it is intended that the Placemaking Plan will address the key aspirations of the local communities. The full consultation programme and event details are due to be published on Friday 26th July 2013 and will be sent to Parish and Town Councils. This programme will explain how Parishes and Towns can become involved in the process and will detail the series of events which will provide further support.

Preparation timetable

Please note that the timetable for the preparation of the Placemaking Plan may be affected by the outcome of the Core Strategy Examination Hearings which will resume in September 2013. Further updates in relation to the Core Strategy Examination will be published on the Examination webpage <http://www.bathnes.gov.uk/services/planning-and-building-control/planning-policy/core-strategy-examination>. Updated information on the Placemaking Plan timetable will made available on the Placemaking Plan webpage www.bathnes.gov.uk/placemakingplan.

Further queries

If you have any questions, please contact the Planning Policy team by emailing planning_policy@bathnes.gov.uk or telephoning 01225 477548.

Yours sincerely,



David Trigwell

Divisional Director Planning and Transport Development

PRESS RELEASE

Press Release

Bath and North East Somerset's Placemaking Plan Launch Document has now been published for consultation.

- The Placemaking Plan will set out how we want key sites to be developed. How should these sites relate to their immediate context? How should new streets and spaces be connected to existing ones? What mixture of homes and jobs should be provided on which sites? What important views should be protected? The Placemaking Plan will answer these and other questions as it sets out the vision, the development requirements and the detailed design principles for key sites.
- The Placemaking Plan will also refresh and update the planning policies used in deciding planning applications in Bath and North East Somerset. How should we manage the changing nature of retailing? How do we ensure more low carbon development? How do we safeguard our high quality environments, and ensure high quality design?
- The primary purpose of the Launch Document is to spark debate and discussion about these detailed planning issues.
- A series of targeted collaborative events are being organised for this Autumn, using the feedback from this initial consultation stage.
- This will generate the content for the next stage in the preparation of the Placemaking Plan.
- Details of these events will be posted on the Council's website
www.bathnes.gov.uk/placemakingplan
- You are invited to comment on the proposed scope and content of the plan and to use the discussion points and issues highlighted in the Launch Document as a basis for your response

Potential New Areas of Housing adjacent to Bath, Keynsham and south east Bristol at Whitchurch

- The Council's Core Strategy is proposing changes to the Green Belt to accommodate additional houses at Odd Down, Weston, Keynsham and Whitchurch.
- As these areas have not yet been confirmed by the Core Strategy Inspector, the Launch Document does not ask questions about their development.
- If the principle of development in these areas is supported by the Inspector, then the Council will work with the neighbouring communities to determine preferred sites and detailed Green Belt boundary options.
- It is anticipated that a decision will be made during Autumn 2013.

Consultation Details

The Placemaking Plan Launch Document and comment s form are available on the Council's website www.bathnes.gov.uk/placemakingplan They can also be viewed at the following locations during opening hours:

- Council offices
 - The One Stop Shop, Manvers Street, Bath, BA1 1JG
 - The Hollies, Midsomer Norton, Bath, BA3 2DP
 - Riverside, Temple Street, Keynsham, Bristol, BS31 1LA
- At all public libraries in the District, including the mobile libraries

The closing date for comments on the Launch Document is 5pm on **Friday, 20th September 2013**.

The Bath Chronicle

Placemaking consultation open for public comment

Friday, July 26, 2013

Local people are being invited by Bath & North East Somerset Council to have their say on what the future of development should look like across the district through the Placemaking Plan.

A consultation started today (25th July 2013) and will continue until Friday 20th September. Key questions are being posed by the Launch Document, such as:

- How should sites relate to the surrounding environment and communities?
- How should new streets and spaces be connected to existing ones?
- What mixture of homes and jobs should be provided on which sites?
- What important views should be protected?
- How should we manage the changing nature of retailing?
- How do we ensure more low carbon development?
- How do we safeguard our high quality environments, and ensure high quality design?

Example
of press
coverage

The main purpose of the Launch Document is to spark debate and discussion about these detailed planning issues. The feedback from the consultation will be used to inform further preparation of the Placemaking Plan. A series of events will take place Autumn onwards as part of this stage.

The consultation does not cover the potential new areas of housing adjacent to Bath, Keynsham and south east Bristol at Whitchurch.

Get involved today

The Placemaking Plan Launch Document and comments form are available on the Council's website www.bathnes.gov.uk/placemakingplan

They can also be viewed at the following locations during opening hours:

- Council offices
- The One Stop Shop, Manvers Street, Bath, BA1 1JG;
- The Hollies, Midsomer Norton, Bath, BA3 2DP;
- Riverside, Temple Street, Keynsham, Bristol, BS31 1LA;
- At all public libraries in the District, including the mobile library service.

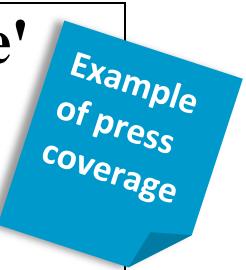
How is this related to the Core Strategy?

The Placemaking Plan sets out the detailed development site principles and other policies for managing development within the context of the Core Strategy. It is being progressed at the same time as the Core Strategy to ensure a robust set of planning policies are in place as soon as possible

Blueprint 'overlooks Bath city centre'

By [Bath Chronicle](#)

Thursday, August 22, 2013



Campaigners have called for a B&NES-wide blueprint to treat the city centre as a community in its own right.

The Federation of Bath Residents' Associations (FoBRA) has criticised a planning document launched by Bath and North East Somerset Council earlier this month.

The Placemaking Plan identifies individual sites across the district from the city centre to rural areas in the Somer Valley.

The plan sets out detailed development principles and other policies for managing development within the context of the council's core strategy.

Among the sites looked at in the document are Manvers Street, Pinesgate, and Avon Street in the centre of Bath.

Chairman of FoBRA, Henry Brown, said the plan had serious omissions.

He said: "Given the string of development sites in Bath along the river corridor, we are disappointed that there is no clear vision as to what the city itself should be like.

"There is much talk about neighbourhoods in different parts of the district, but no sense that the centre of Bath should be considered as a vitally important neighbourhood in its own right."

APPENDIX 1

**Connect magazine,
issued August 2013
and distributed to
around 76,000
households across
Bath and North East**

**ister
ering electronically**

POLLING STATION

Connect competition

What area is this?

WIN £50!

Work in progress

Victoria Hall is taking shape

Cllr Tim Ball

Working For You - All Year Round

**Examples
of press
coverage**

In Contact

July 2013

Placemaking plan

Bristol

New Mental Health

Bristol

Bath & North East Somerset

For this newsletter in other formats call 0117 9654444

Twerton Community News

Twerton Community News is edited by Tim Ball & Gerry Curran

Wednesday, 31 July 2013

Council Launches place making consultation

Bath & North East Somerset Council have launched its Place Making Plan consultation document to supplement its Core Strategy working.

The council wish to hear from residents on detailed ideas on the plan that will run until 2029.

To read more on this please go to Tim Ball's personal website by following this link.

Bathnes Place Making

Posted by Tim Ball at 10:00

Labels: Bath, Placemaking, planning

Tim Ball & Gerry Curran

Placemaking Plan Launch Document 25th July - 20th September 2013

COMMENTS FORM

Now is your chance to comment on the issues and opportunities for key development sites and suggested planning policy framework for considering planning applications in Bath and North East Somerset up to 2029. You are invited to comment on the proposed scope and content of the plan and to use the discussion points and issues highlighted in the Launch Document as a basis for your response on the development sites and policy areas.

Complete the form by filling in Part 1 with your contact details and use Part 2a for your comments on the proposed scope and content of the Plan, and Part 2b for your comments on the Development Sites or Policy Area. Each of the Development Sites and discussion points for the Policy Areas has been numbered for you to refer to in your response. Please be succinct in your response and make it clear which site or policy your comments relate to.

You are strongly encouraged to send your completed form(s) using email to placemakingplan@bathnes.gov.uk. Alternatively you can send the form to Planning Policy, Bath & North East Somerset Council, PO Box 5006, Bath BA1 1JG.

Your comments will be used to inform the next stage of the Placemaking Plan.

Part 1: Contact details			
Email is the Council's preferred method of communication and enables us to contact you quickly and efficiently. Please also provide a postcode with details of your address.			
Personal Details		Agent Details (if applicable)	
Title		Title	
First Name		First Name	
Surname		Surname	
Job Title <i>(only if applicable)</i>		Job Title	
Organisation <i>(only if applicable)</i>		Organisation	
Email		Email	
Address		Address	
Postcode		Postcode	
Date		Date	

Part 2a: Comments on scope and content

Do you agree with the proposed scope and content of the Placemaking Plan? It would be helpful if you could give reasons for response.

Please expand this box or attach a separate sheet if you require more space.

Part 2b: Comments on sites or policy areas

Which development site or policy area are you commenting on? Please use the relevant reference number from the Launch Document for each comment.

Please expand this box or attach a separate sheet if you require more space.

See our website for more information:

www.bathnes.gov.uk/placemakingplan

Please note that names and comments will be published

APPENDIX 1

Summary of engagement with Parish & Town Councils

Stakeholders engaged	Key issues raised/outcomes
All Parish and Town Councils (2x representatives from each Parish/Town Council) Workshop September 2013	<ul style="list-style-type: none"> The limited time required to undertake the character and site assessments was raised. The issue around the need to allocate housing in Policy RA2 villages was raised. The outcome was 42 out of 47 parishes signing up to complete character assessments or/and site allocations.
Paulton Parish Council Meeting Meeting October 2013	<ul style="list-style-type: none"> Guidance issued on completing the character and site assessments and how the polices within the emerging Core Strategy applied to Paulton.
Ubley Parish Council Meeting April 2014	<ul style="list-style-type: none"> Meeting to discuss the Ubley Placemaking Plan character assessment and development opportunities. Ubley Parish Council raised concerns that there were no potential site allocations after they had undertaken the character and site assessments.
Radstock Parish Council Meeting April 2014	<ul style="list-style-type: none"> Issues were raised over the time frames being proposed and the level of resources required undertaking the character and site assessments. Guidance issued on completing the character and site assessments and how the polices within the emerging Core Strategy applied to Radstock. Meeting to discuss the site allocations proposed for the Town Council and how being involved in the PMP could help to guide the Town Council towards a cohesive plan for the area. Radstock Town Council agreed to partake and complete the site and character assessments.
Bath City Conference Meeting April 2014	<ul style="list-style-type: none"> Issues were raised around the Cattlemarket redevelopment and the need for a sensitive conservation led design in the Placemaking Plan. Questions were raised around how the residents of bath would be included in the consultation.
Batheaston Parish Council Meeting Meeting May 2014	<ul style="list-style-type: none"> Issues were raised over the Placemaking Plan- explanations were required over what it would and would not cover. Questions were raised over whether green belt land would be included as allocations or not.

APPENDIX 1

<p>West of England Rural Network Meeting June 2014</p>	<ul style="list-style-type: none"> • Questions were raised over how villages washed over by the Green belt allocate sites for development? • Concerns were raised around how villages could guarantee the type of housing that they require and what mechanisms could be used to secure appropriate housing.
<p>Bathampton Parish Council Meeting August 2014</p>	<ul style="list-style-type: none"> • Questions were asked about Local green Space designations in the Placemaking Plan
<p>Hinton Blewett Parish Council Meeting August 2014</p>	<ul style="list-style-type: none"> • Meeting to discuss the Placemaking Plan and the consultation in the Autumn 2014.
<p>Timsbury Parish Council Residents Meeting August 2014</p>	<ul style="list-style-type: none"> • Concerns were raised about the Placemaking Plan rural areas program and how the parishes assessed sites for potential development. • Issues were raised about the consultation program and how residents of parishes could be involved.
<p>Radstock Town Council Meeting September 2014</p>	<ul style="list-style-type: none"> • Issues were raised over the time frames being proposed and the level of resources required undertaking the character and site assessments. • Guidance issued on completing the character and site assessments and how the policies within the emerging Core Strategy applied to Radstock. • Meeting to discuss the site allocations proposed for the Town Council and how being involved in the PMP could help to guide the Town Council towards a cohesive plan for the area.
<p>Cameley Parish Council Meeting September 2014</p>	<ul style="list-style-type: none"> • Questions were raised over how non-allocated sites could be protected before the Placemaking Plan is formally adopted. • Issues and concerns were raised that Cameley Parish Council should not be allocating land for development as there is an application which may go to an appeal hearing. • The Parish Council wanted the Cameley site to be deleted until after the deadline for making an appeal had elapsed.
<p>High Littleton Parish Council Meeting October 2014</p>	<ul style="list-style-type: none"> • Meeting to discuss the High Littleton and Hallatrow Allocations.

*Display Board
for City
Conference*

PLANNING POLICY UPDATE

Core Strategy update

The Core Strategy sets out the strategic planning framework for Bath and North East Somerset. It sets out the amount of housing and jobs that the Council is seeking to provide up to 2030, and identifies the broad areas where this development should happen. It also contains high level planning policies that will help to ensure that the Council can deliver its strategic objectives which include responding to climate change, protecting valued assets, and delivering affordable housing.

For the Council to adopt the Core Strategy and for it to have weight in the determination of planning applications, it has had to go through an examination process and be found 'sound' by a Planning Inspector.

After 3 weeks of examination hearings during March-April 2014, the Core Strategy hearings have now closed.

The Inspector in the final hearing session stated that he is intending to issue his final report and decide whether the Core Strategy is sound by the end of June 2014.

Please see our website for the latest news: www.bathnes.gov.uk/corestrategy

Neighbourhood Planning

The Council has prepared 'My Neighbourhood: Neighbourhood Planning Protocol'. This outlines new and existing tools for community involvement in planning and includes new information on:

- Designating Neighbourhood Forums in Bath
- Neighbourhood Plans
- Neighbourhood Development Orders
- Community Right to Build

The document also outlines the range of ways local communities can influence planning decisions.

Local Activity

There are now nine identified Neighbourhood Planning Areas in the District. Many of the areas are making good progress in their Neighbourhood Plans undertaking consultation and preparing evidence. For example:

- Clifton/Fonthill and Midsummer Norton have held Neighbourhood Planning events locally and are progressing well
- A cluster of parishes in the Chew Valley are working collaboratively
- Freshford & Limpley Stoke are preparing to submit their Plan for examination in summer 2014

The National support package for Neighbourhood Planning is still accepting applications for funding from Parish/Town Councils and Neighbourhood Forums – full details can be found on our website:

www.bathnes.gov.uk/neighbourhoodplanning



Supplementary Planning Documents adopted in 2013

Placemaking Plan

The purpose of the Placemaking Plan is to complement the strategic framework in the Core Strategy by setting out detailed development principles for identified development sites and other policies for managing development across Bath and North East Somerset.

The Placemaking Plan will be expected to help deliver the strategic objectives of the Core Strategy:

- Pursue a low carbon and sustainable future in a changing climate
- Protect and enhance the District's natural, built and cultural assets and provide green infrastructure
- Encourage economic development, diversification and prosperity
- Invest in our city, town and local centres
- Meet housing needs
- Plan for development that promotes health and well-being
- Deliver well-connected places accessible by sustainable means of transport

All these objectives are key in delivering high quality, sustainable, well located development and are themes that will permeate through the whole Placemaking Plan. The Place-based and Core Policies in the Core Strategy provide the context for the Placemaking Plan.

Placemaking Plan Options Document is the next stage in the plan preparation process. This will be available for public consultation towards the end of 2014. For further information on the Placemaking Plan, visit our website: www.bathnes.gov.uk/placemakingplan

Review and monitoring

The Council's **Authorities Monitoring Report** assesses both the implementation of the local development scheme and the extent to which the objectives and targets in local development documents are being implemented. It comprises of a number of topic based reports that are published during the year, such as housing, employment, retail, sustainable construction and urban design. More information can be found on our website: www.bathnes.gov.uk/planningpolicy

April 2014

Bath & North East Somerset Council

PLACEMAKING PLAN

The role of the Placemaking Plan is to help enable the delivery of high quality development on key sites throughout Bath and North East Somerset. It will set out the site specific aspirations, as well as the design, mix of uses, planning and infrastructure requirements to enable these sites to progress. It adds the detail to the strategic context set by the Core Strategy and will be informed by a commissioned evidence base, and other strategies and initiatives as relevant, including the Enterprise Area Masterplan and the Transport Strategy.

The first stage in the production of the Placemaking Plan was the Launch Document which was designed to stimulate debate and discussion.

This document was available for public consultation last summer when it generated a healthy response to a variety of issues. These outputs will help to shape the next iteration of the Placemaking Plan which is currently being prepared.

It is intended that the Placemaking Plan Options Document will be available for public consultation towards the end of 2014.

It will include options around the following key considerations:

- the development of key sites: the vision and detailed design and site requirements for these sites and how they should contribute to their wider context
- which important assets should be protected, and how they could be enhanced
- the development management policies needed to deliver the right development in the right places
- the extent of local designations and whether any of these should be reviewed e.g. housing development boundaries
- provision of a planning framework for local communities

The Council will work with local communities and stakeholders during the production of the Placemaking Plan, ensuring that it is both deliverable and reflects community and stakeholder aspirations.

If you are a local resident, a developer or other stakeholder, engaging with the Placemaking Plan will enable you to get involved in determining the specifics of development proposals.

Find out more on our website:
www.bathnes.gov.uk/placemakingplan

Please contact us if you would like more information about the Core strategy or Placemaking Plan.

 01225 477548



BATH

There are a series of significant development opportunities within Bath that need to be taken forward with vision and aspiration. This vision and aspiration must however be intelligently applied, informed by a thorough understanding of the qualities of Bath as a place, its outstanding universal value as a World Heritage Site, and its real potential. The Placemaking Plan will be advocating a much more sustainable approach to city development than before.

For instance the Enterprise Area has the ability to play a key role in providing much needed accommodation for the area's flourishing high-value business sectors. Within it are a wealth of successful businesses, and a significant number in the sectors of design, engineering and technology. The area also contains a number of derelict and underused sites that have huge potential for transformation, providing inspirational locations for economic growth, set in close proximity to key transport infrastructure, residential communities, and an enhanced riverside environment.

The Placemaking Plan will also consider in more detail the role and function of the Bath neighbourhoods, including their local centres and infrastructure requirements such as schools.

Supported by the necessary infrastructure, Bath in the future will be a city where businesses, academia and creativity combine to create value and enhance the quality of life.

APPENDIX 1

Extract from the Bath Enterprise Area Masterplan Vision Report

HOW HAVE WE CONSULTED ON THE MASTERPLAN?

The Masterplan, unlike the Core Strategy or SPD is not a formal planning policy document. As such its preparation is not required to comply with statutory provisions. However the Council has recognised the importance of engaging the community from the outset of the Masterplan process, with selected stakeholder engagement at each stage as below:

STAGE	DATE	ENGAGEMENT
1. Commissioning/ Briefing	Summer 2013	Urban Regeneration Panel / B&NES
2. Evidence gathering	November 2013 – February 2014	Stakeholder workshop 1 / meetings
3. Emerging Spatial Strategy	February 2014 – March 2014	Stakeholder workshop 2 / meetings
4. Spatial Strategy Options	April 2014 – June 2014	Stakeholder meetings / Bath City Conference
5. Testing of Spatial Strategy and Delivery	June – August 2014	Stakeholder workshop 3 / meetings
6. Approval of Masterplan	November 2014	B&NES Members (Cabinet)

A total of 63 organisations or individuals have fed into the Masterplan through the workshop process. A further 22 organisations have been involved through individual meetings/presentations and discussions.

Stakeholder Events

3 events were held for invited stakeholders, and an open event consisting of exhibition boards and other media took place at the Bath City Conference:

26th Feb – Workshop 1 – the vision, values and overarching themes for the entire EA

26th March – Workshop 2 – the “5 lives” (themes) and their delivery through each quarter of the EA

30th April – Bath City Conference - coordinated with both the Placemaking Plan, Bath Quays Waterside and the Getting Around Bath Transport Strategy

8th July – Workshop 3 – specific delivery aspects of each site (e.g. Manvers Street, Innovation Quay)

Stakeholder Specific Sessions

- Stakeholder sessions have also been held with: University of Bath, Bath City College, Federation of Bath Residents, Bath Bridge, Bath BID, Sustrans and others.
- Young people have been involved through two student projects:
 - Two groups of students from UWE (Planning & Architecture Final year students) and Royal College of Arts (Engineering Design) worked with Feilden Clegg Bradley and B&NES to engage young people through the #MyBathMyCity project (see @ MyBathMyCity).
 - The SMART City project (with Buro Happold) has helped inform the Masterplan evidence base on interaction, creativity and the **integration of Smart City principles**.
- Key landowners and private sector developers have been involved, including Bath property agents. Engagement is ongoing and related to specific sites, for example Green Park and Manvers Street.

Placemaking Plan

The role of the Placemaking Plan is to create the conditions for the delivery of high quality development on key sites throughout Bath and North East Somerset. It will set out the site specific aspirations, as well as the design, mix of uses, planning and infrastructure requirements to enable these sites to progress. It also adds the detail to the strategic context set by the Core Strategy and will be informed by the other initiatives relevant to each place.

The first stage in the production of the Placemaking Plan was the Launch Document which was primarily about stimulating debate and discussion. This document was available for public consultation last summer when it generated a healthy response about a wide variety of issues. These outputs will help to shape the next iteration of the Placemaking Plan which is currently being prepared.

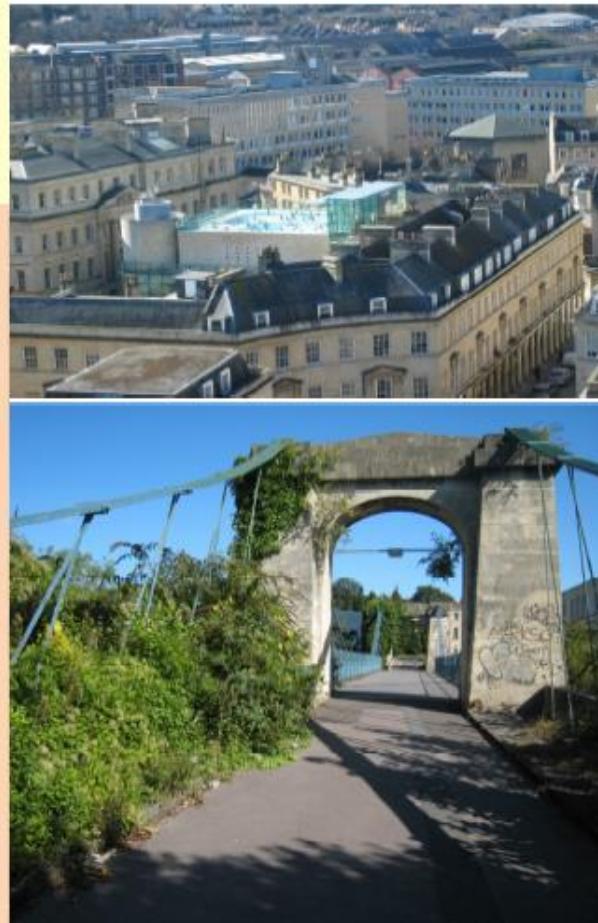
It is intended that the Placemaking Plan Options Document will be available for public consultation towards the end of 2014.

There are a series of significant development opportunities within Bath that need to be taken forward with a vision and aspiration beyond which the city has witnessed since its last transformation over two hundred years ago. This vision and aspiration must however be intelligently applied, informed by a thorough understanding of the qualities of Bath as a place, its outstanding universal value as a World Heritage Site, and its real potential.

Many of the Bath sites that are now being considered for redevelopment are available due to the architectural, planning, development and political failures particularly from the 1950s onwards; when typically the response to context was misunderstood, when cost was often more important than value, and when the need for development trumped the need for quality. The Placemaking Plan advocates a much more sustainable approach to city development.

www.bathnes.gov.uk/placemakingplan

Extract from
Planning
Policy
Newsletter
Spring 2014



Main points from Placemaking Plan Launch consultation

Policy /Site	Comments / Key Issues
General - Consultation Procedure	<p>Request regular discussions between the planning department and FoBRA or individual associations for consultation, supplemented by more conventional techniques. Resident's Associations will be happy to be used as 'a way of disseminating information'</p> <p>Since Neighbourhood Planning Protocol adopted, little progress has been made in reaching Bath communities in the interim.</p> <p>Concerned that default engagement may still be the same "stakeholder" and interest groups (e.g. Bath Preservation Trust, Bath Heritage Watchdog etc.) as pre the Localism Bill and NPP and communities are still not effectively involved.</p> <p>..“stakeholders” are selected in an arbitrary way. FoBRA (Federation of Bath Residents Associations) ,and possibly some of their member associations, have come to be regarded as key stakeholders. Consider that while FoBRA have many members, they do not represent the views of all residents associations.</p> <p>Bath communities need to be appropriately represented in line with Parish Councils</p> <p>Questions relative weight which will be accorded to input from previously selected Bath “stakeholders” compared to that forthcoming from Bath communities</p>
General – Plan role	<p>Large number of objections to the Plan on basis that Core Strategy (CS) is still in progress - Placemaking Plan (PMP) consultation has been limited by the approach taken by the Core Strategy, in particular by the proposals for overall housing numbers and their distribution, affecting the extent of land to be released from the Green Belt.</p> <p>The two stage approach taken to Green Belt Review makes it necessary to make these representations in relation to the PMP as well.</p> <p>If green belt boundaries are not defined in the CS, they will need to be defined in the PMP. This will cause delay. If the strategic sites are to be allocated in the PMP, it is considered that the PMP is premature to the outcome of the CS.</p> <p>The draft CS includes a high level of detail relating to the strategic sites, and the emerging PMP is proposing a further layer of Development Management policies. Any further policies relating to the strategic sites should only be included if considered essential and not already covered by other provisions of the development plan framework. They should also be sufficiently flexible to enable the plan to be ‘effective’.</p> <p>US term "Placemaking Plan" seems to have created confusion.</p> <p>The Placemaking title of the Plan emphasis a welcome commitment to ensure individual proposals are viewed in a wider context, responding to an area's attributes, sensitivities and the opportunities which may derive to secure improvements and deliver “better places”</p> <p>Concern at lack of a site allocations plan which would set out clear expectations for opportunist as well as planned development sites.</p> <p>Document should be re-ordered so that the Development Management Policies section is set out first, ahead of the Development Sites.</p> <p>Key objectives and aspirations should be translated into practical deliverable policies</p> <p>there should be a clear statement about saving specific planning policies from the current Local Plan</p>

APPENDIX 2 (Sites)

Policy /Site	Comments / Key Issues
	<p>Transport is vital and yet this cannot be assumed under the general heading of “infrastructure”. Page 3 What is the Placemaking Plan? would be an appropriate point to state that the Plan will be supported by the Bath Transport Strategy.</p> <p>Commitment to implementing initiatives such as the Public Realm and Movement Strategy and the Building Heights Strategy is essential. BPT is concerned that key documents like these must be adopted as SPDs if the PMP is to deliver the vision for the city as set out in the Core Strategy.</p>
Vision	<p>Page 4 Requires amendment of first bullet re protecting assets particularly sensitive to change to “Environmental assets need to be protected, irrespective of their sensitivity to change, if the aim is to create better places.” (NB see guidance)</p> <p>Vision should come before description of Enterprise Area.</p> <p>Vision should state forcefully the need to reduce the traffic congestion and air pollution.</p> <p>Vision should prioritise brownfield development ahead of green field sites, particularly on the edge of Bath</p> <p>PMP states it will be ‘informed’ by the strategies and other documents listed “it needs to be both consistent with these strategies and given appropriate weight in the planning process by SPDs covering the key issues such as building heights and public realm standards.”</p>
Enterprise Area	<p>Concept and principles need to be more clearly articulated</p> <p>Timing of delivery of Enterprise Area framework will be of essence as regards all other consultation for the Placemaking Plan</p> <p>Clarify what the Enterprise Area status means in practice, specifying what measures are available to landowners within the Enterprise Area to assist with the bringing forward and delivery of development</p>
General - Design	<p>Curo wishes to ensure that:</p> <ul style="list-style-type: none"> • the principles of good design and sustainability are more clearly articulated both in the general development management policies and in relation to specific sites. • Requirements to address climate change are not unduly onerous and are properly considered in the context of viability. • There is proper emphasis on wider social and economic regeneration of existing housing neighbourhoods and communities • Prescriptive local housing standards are not laid down contrary to emerging national guidance. • Flexibility towards housing densities and car parking standards appropriate to local circumstances <p>The PMP (along with the Core Strategy) should not place undue burdens on the redevelopment opportunities that may exist within the existing housing stock. Curo seeks to maximise both financial and social return and encourage positive regeneration.</p> <p>The emphasis should be as much on enhancing the quality of existing housing properties and places as on building the numbers of extra homes required. There are opportunities for redevelopment of existing neighbourhoods, to provide mixed tenure communities</p>
General -	English Heritage (EH) note an intention to ensure change in Bath is informed by “a thorough

APPENDIX 2 (Sites)

Policy /Site	Comments / Key Issues
Heritage	<p>understanding of the qualities of the city as a place, its outstanding universal value as a World Heritage Site, and its real potential". EH would welcome an opportunity to work with the Council to develop the Plan and guidance for the individual development sites and to further engage with you in focussed technical design and planning work (charrette) to inform a solution to the design challenges ahead.</p> <p>EH Note the commitment to reduce the number of heritage assets at risk.</p> <p>EH raise this matter mindful of the "issues" set out in relation to the proposed allocation at Coomb End in Radstock (SSV6) which fail to pick up the relationship of the site to the town's mining heritage and that it falls within a Conservation Area[and?] on the national Heritage at Risk Register.</p> <p>National Trust - New development proposed for the development sites in and around the City of Bath should respect the historic character and appearance of the World Heritage Site and should not have an adverse effect on the green setting of the city.</p>
General – Environmental Designations	<p>The map on p14 should show the focus of the SAC</p> <p>Green Infrastructure Plans should become part of the development plan, and the AONB and Green Belt designations should be absolutely respected. Green spaces are fundamentally important and should never be lost</p> <p>EA It needs to be ensured that the scale, type and location of development detailed in the allocations are fully justified in relation to the flood risk sequential test, as required by the NPPF. We would expect this to be demonstrated for all relevant sites in a transparent way as part of the evidence base for the placemaking plan</p> <p>Coal Authority - an assessment should be made of the likely impact on mineral resources, including coal. This will help to ensure that any potential sterilisation effects (along with whether prior extraction of the resource would be appropriate) are properly considered in line with the guidance in paragraphs 143 and 144 of the NPPF.</p> <p>Greenway Residents Association wish to oppose any housing or other development in the following areas:</p> <ol style="list-style-type: none"> 1. The playing fields of Beechen Cliff School 2. The land in Lyncombe Vale, now surrounding the Sustrans Two Tunnels Cycle and Pedestrian path. 3. The wooded slopes of Beechen Cliff and the land behind , 4. The area of Alexandra Park 5. The two allotments, one behind Beechen Cliff, the other at the west end of Lyncombe Vale Road <p>large field between Lyncombe Vale and Lyncombe Vale Road, and in the field to the north of Rosemount Lane</p>
General -River / Canal	<p>It would be advantageous if the River Regeneration Trust consultations ref Bath River Corridor could be conducted in combination with the PMP collaboration as otherwise further unexpected changes may result in due course. T</p> <p>Welcomes the identification of proposals for green infrastructure and the strategic importance of the river corridor in terms of creating a 'green heart' for the city. Long distance views of river to be protected throughout. .</p> <p>Public realm improvements to encourage the public to stop and enjoy the river and canal with</p>

APPENDIX 2 (Sites)

Policy /Site	Comments / Key Issues
	<p>seating and facilities for eating and drinking where possible. Enable the riverside to act as a sustainable transport route. Linkages between existing routes, across the river as a connection route out into open countryside and between settlements.</p> <p>The development sites give an opportunity for people to directly access the river corridor and encourage and facilitate increased usage and enjoy the wildlife using it. Support the recognition that creating and enhancing natural riverside habitat needs to be integral to the development of these sites.</p> <p>Key concern for Natural England will be to maintain and/or enhance the river corridor function for foraging and commuting bat species associated with the Bath and Bradford on Avon Bat Special Area of Conservation (SAC).</p>
General – River Crossing	<p>Need for an alternative major river crossing to be developed in Wiltshire to enable the crossing at Bath to be closed to commercial vehicles.</p>
General - Sites	<p>Only site allocations that are deliverable over the Plan period should be included in any further iterations of the Plan.</p> <p>Several of the allocations may not have been delivered because of the presence of significant constraints or the requirement for new infrastructure that makes a site unviable. It is anticipated that this situation will continue to occur throughout the life of the local plan.</p> <p>PMP could have explored options for different scales of development at the strategic locations.</p>
General – Sites Bath	<p>It is good that there is a series of sites, but they should be seen as a string of pearls, each connected to and dependent on the next, not as completely standalone projects</p> <p>issues to consider - hotel provision, licensing, the conversion of residential houses to short-term lets (hen parties), HMOs, and parking policy, adverse residential amenity effects of night-time economy [NB this is relevant to Development Management policies part.]</p> <p>Consider a real need for a major conference centre in Bath.</p> <p>Commends overall approach to new development in central Bath and the call for a new paradigm in placemaking</p> <p>Western Riverside (West) area sites adjacent to Upper Bristol Rd need to be included in PMP including land bounded by the River Avon to the south, Upper Bristol Road to the north and Windsor Bridge Road to the west, and incorporating, in part, the Victoria Park Business Centre and waste recycling centre. Advice required on how the Local Authority will deal with the relocation of this facility.</p> <p>The Charlotte Street car park area, including the school and tennis courts, is an obvious area for improvement.</p> <p>The long-term future of the RNHRD at Upper Borough Walls must be questionable There should be a plan for this important location.</p>
SB1 Cornmarket, Cattlemarket, The Hilton Hotel	<p>Urgent need to rehabilitate the Corn Market and Cattle Market, which have been eyesores for far too long.</p> <p>surprised that the old King Edwards School building on Broad Street has not been included</p> <p>plans for the redevelopment of the Hilton Hotel and the multi-storey car park are too indefinite to form part of a redevelopment</p> <p>Development of the site should emphasize mixed uses with residential uses predominating</p>

APPENDIX 2 (Sites)

Policy /Site	Comments / Key Issues
	<p>but with a continuous commercial frontage on Walcot Street combining small and medium sized units.</p> <p>The Cormarket could provide space for smaller market traders (possibly jewellery, etc.) (complementing the Artisan's quarter).</p> <p>The Council should not constrain private sector investment by prescribing detailed layouts</p> <p>The area should reflect Walcot Street style which is finer grained, more traditional in character. The distinctive and eclectic character of Walcot Street needs to be retained and enhanced. Bath does not need an expansion of larger scale city centre uses in this area.</p> <p>Establish a more effective link between the commercial heart of the city and the Walcot Street area of residential streets and small, independent shops</p> <p>Building massing should reflect the character of the surrounding area with building heights limited to four levels above Walcot Street grade.</p> <p>Any mix of uses should aim to reduce to a minimum the need for on-site parking</p> <p>Suggest that both the river frontage and Walcot Street frontage are respected in new development, rather than the current set-backs.</p> <p>The views across to Bathampton Down and Prior Park from various points along the street are an important element of the character of the street and should be maintained. The view to the rear of Pulteney Bridge is particularly characterful and yet seldom seen.</p> <p>Open up access to the riverside and reintegrate it with Walcot Street as a coherent whole.</p> <p>Concern about deliverability of a river path. If further extension of a riverside walkway to Beehive Yard and beyond proves impractical, as seems likely, then a suitable destination for pedestrians should be provided within the site. This could, for example, take the form of a riverside park with moorings and a pedestrian bridge across the river to St Johns Road could also be considered.</p> <p>Promote habitat creation where possible.</p> <p>Site falls predominantly in Flood Zone 1 due to existing defences being above the 1 in 100 year predicted flood level. Any development coming forward should ensure a sufficient standard of protection against flood risk is maintained for the lifetime of the development. As part of our maintenance requirements for main rivers we would look to have a sufficient margin next to the river (e.g. 8 metres) to allow access for inspection and any required emergency works.</p>
SB2 Central Riverside & Recreation Ground	<p>Support a policy context which facilitates an enhanced arena facility at the Rec; support for a high quality frontage to the river with ticket office and appropriate retail, together with river as well as ground facing hospitality suites.</p> <p>The framework should allow for a range of cultural, sporting and leisure facilities to be accommodated at the Recreation Ground. It should be in favour of similar uses without the need to onerously prove that the intended use is appropriate for this location, if the intended use would add to the objectives sought by the policy.</p> <p>Other commercial tenants could occupy some of the riverside areas, thereby securing year round beneficial use and activity on the water frontage</p> <p>Need for the long term future of the leisure centre to be firmed up to inform the development potential of that site</p>

APPENDIX 2 (Sites)

Policy /Site	Comments / Key Issues
	<p>The area covered by policy SB2 is diverse and a 'one size fits all' approach is unlikely to be appropriate;</p> <p>Proposed amendments to the policy to refer to an 'arena' rather than a stadium</p> <p>Supports the Rec being a central feature and attraction, rather than turning its back to the City, is a positive and attractive asset at its heart, linking with the town centre and surrounding land uses</p> <p>Supports the suggestion of a masterplanned approach to the whole of this area but questions whether this is can be achieved in time to influence Bath Rugby's proposals for redevelopment of the rugby stadium.</p> <p>The proposed alterations to the Rec could facilitate the 'green heart' approach</p> <p>Site should be porous, whilst respecting the pitch, to allow people to walk through the grounds and to the Rec beyond, unless an event is taking place</p> <p>Visual impact of developments on the Rec is key.</p> <p>The Sports and Leisure Centre has a tired architectural treatment. Attention be given to the surrounding spaces which are poorly resolved, especially fronting the river and Bath Rugby's Hampton Stand.</p> <p>Concern over physical implications of access to the Colonnades and any footbridge</p> <p>Support for Council considering the regeneration of the Guildhall Vaults</p> <p>Opportunities could include public realm improvements.</p> <p>Any development of the site must safeguard the amenity of residents; otherwise it will jeopardise the distinctive feature of Bath, namely that so many people actually live in the central area.</p> <p>Concern over the wider implications for traffic management of any new car or coach parking facilities. Concern at the notion of relocating bus and car parks to the area. Coach parking and or drop off in the Pulteney Road area are worthy of consideration.</p> <p>A more effective and suitable solution should be brought forward for managing foot traffic, cycle and vehicular movements in and around the identified SB2 development site</p> <p>The cross-river vision is welcomed. A green avenue into the heart of Bath could be wonderful, by contrast with the more formal route along Great Pulteney Street.</p> <p>Preference would be for new footbridge to be close to North Parade Bridge to keep clear sightlines to the weir and Pulteney Bridge</p> <p>New development of this area provides a significant opportunity to enhance the river corridor at this location and enable habitat creation.</p> <p>Potential for hydropower from river. Visual impact of hydropower installation.</p> <p>Potential for new navigation and recreational activities</p> <p>Opportunity to remove, replace or improve the radial gate on Pulteney Weir. The gate is widely considered to be an eyesore on this stretch of the river and is likely to become a maintenance liability in the future. Also the concrete revetment at the toe of parade gardens is failing and becoming exposed. Through development of this wider area there is therefore a major opportunity for the Environment Agency to work in partnership with the Council, developers and landowners to combine available funding/resources and deliver a scheme that</p>

APPENDIX 2 (Sites)

Policy /Site	Comments / Key Issues
	<p>has wider benefits for this area of the city</p> <p>The area falls within Flood Zone 3a and 3b and functions as an important storage area during flood events. Any built development proposals would therefore need to be fully justified on sequential and exception test grounds as detailed in our general comments above. It will need to be ensured as proposals coming forward are safe and do not result in an increase in risk to third parties.</p>
SB3: Manvers Street	<p>The redevelopment of the Manvers Street site, in principle, is supported.</p> <p>Royal Mail Estates Ltd considers Delivery Office site has potential for residential led mixed use redevelopment scheme on up to 4 / 5 storeys in parts without detrimental environmental impact subject to</p> <ol style="list-style-type: none"> 1. re-provision of an operationally satisfactory relocation facility (either on or off site) from which to sort and deliver mail to the BA1 and B2 postcode areas, and 2. redevelopment and re-provision of Bath Delivery Office being financially viable and attractive, meeting all Royal Mail's business requirements. <p>Concerns regarding the 'employment led' concept referred to in the draft masterplan and suggest that mixed uses, including leisure, appropriate retail and housing, alongside employment would optimise the opportunity to deliver development.</p> <p>Incremental approach is suggested to allow the development to come forward in isolated phases which are independent to each other to take into account likely differing timescales in disposing of the sites, together with relocation requirements</p> <p>Site has only limited links to the city's retail core to the west. The emphasis should be on residential development with commercial uses limited to supporting retail and services</p> <p>There is an opportunity to create a pedestrian link to the station from the north.</p> <p>Development in this area must be planned in conjunction with SB2.</p> <p>Building massing should reflect the height of buildings on South Parade and Manvers Street</p> <p>This is an important site with considerable scope to enhance the impression given to people arriving by train.</p> <p>Development needs to reinforce the impression given by the views from the train by preserving and enhancing the setting of South Parade and St John's Church and retaining the glimpses of the green hillsides.</p> <p>Redevelopment of the sorting office offers extensive frontage to the River Avon not presently accessible by the public. Opening up the riverside is a priority.</p> <p>This site falls partly within Flood Zone 3 and the existing gates within the sorting office are below the 1 in 100 year flood level. The masterplanning for this site will need to take into account the need for the site to be raised which would be our preferred option. Any loss of compensation for the redevelopment of this site has been taken into account as part of the Bath Quays Waterside flood conveyance project.</p> <p>Previous activities (e.g. vehicle depot) at this site are likely to have resulted contamination.</p>
SB4: Bath Quays North	<p>Bath Quays North and South, and the flood mediation work, need to be planned together as the heart of the enterprise area.</p> <p>Surprised that there is no mention of the ongoing consultation on the Bath Quays Waterside</p>

APPENDIX 2 (Sites)

Policy /Site	Comments / Key Issues
	<p>project which will have a significant impact on the PMP for this area.</p> <p>Seeks primarily a business /commercial quarter, not just retail. Provision of high quality office accommodation, both large and small, must be part of the mix, particularly at the high-wage end; with a smaller proportion of residential.</p> <p>Potential for new concert hall/ performance space should be explored.</p> <p>Like to see a mixed use development with the majority for employment, but with a strong public access, perhaps around a library, see, for example, the Vancouver Central Library</p> <p>Requests minimal retention of car parking. The place for alternative parking might instead be Charlotte Street, with new shuttle buses serving the central area (in a loop with the station and Charlotte Street at opposite ends).</p> <p>Priorities include linking this area back into the city centre and creating access to the river.</p> <p>Opportunities to reclaim historic street patterns in Bath Quays North should be seized in order to provide a coherent relationship with the adjacent city centre.</p> <p>Scope to create a distinctive and different area with a character of its own</p> <p>Innovative architecture could be welcome in this location</p> <p>Building heights must be carefully managed to protect views down into and across the city centre from the surrounding hills.</p> <p>A new pedestrian/cycle river crossing should form part of the plans to ensure an active relationship with South Quays.</p> <p>Recommend that a through pedestrian and cycle route be created through Somerset Street to align with a new bridge to Bath Quays South leading to Westmorland Road and Oldfield Park residences beyond. A public square or atrium along the route at ground level would avoid the area becoming sterile.</p> <p>Support for the plans to divert Green Park Road to give access to the river. Support for the canalisation of the river to address flood alleviation.</p> <p>This site falls partly within a flood risk area. The Bath Quays Waterside flood conveyance project will help to enable this site. As part of its redevelopment opportunities to improve access to the river and provide new habitat should also be sought. Given the brownfield nature of the site any risk associated with contamination would also need to be addressed</p>
SB5: Bath Quays South	<p>The Enterprise Area appears to have considerable merit but the concept and principles are not clearly articulated.</p> <p>No mention of the ongoing consultation on the Bath Quays Waterside project</p> <p>Support a mix of uses in this area, with active ground floor uses, including leisure uses to provide activity into the evenings, and some residential uses as well as commercial uses above.</p> <p>Support the intention for any new development to be employment led, rather than residential, given the high flood risks in this area of the city.</p> <p>Tenure of the business space should be designed to suit start-up and innovative businesses</p> <p>Development potential should be considered all the way up to Midland Bridge and include the land to the south of the Lower Bristol Road, including Wood Street, Oak Street, Cheltenham Street, Westmoreland Street, Sydenham Buildings and Westmoreland Drive.</p>

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Policy /Site	Comments / Key Issues
	<p>Opportunities to reclaim historic street patterns in Bath Quays North should be seized in order to provide a coherent relationship with the adjacent city centre.</p> <p>Industrial past exhibited by this site should be the catalyst for new development but would not recommend wholesale preservation. Retention of the façade.</p> <p>New buildings could be large, but concern about height.</p> <p>Opportunity for a distinctive and different area with a character of its own</p> <p>Blend of old and new will create an attractive destination for business space, including creative industries.</p> <p>Building heights must be carefully managed to protect views down into and across the city centre from the surrounding hills.</p> <p>A new pedestrian/cycle river crossing should form part of the plans.</p> <p>Continuation of the route formed by a new bridge and Bath Quays North should link to Westmoreland Road / Lower Oldfield Park.</p> <p>Bath Quays North and South, and the flood mediation work, need to be planned together as the heart of the enterprise area</p>
SB6: Bath Western Riverside East	<p>More detail and content needed than in the current Western Riverside SPD to have any meaning and purpose</p> <p>Support for proposals which would allow wholesale, comprehensive redevelopment.</p> <p>Multi-storey car park in this area, additional to the one Sainsbury's propose, is not appropriate: it would be better to deck Charlotte Street.</p> <p>Consideration needs to be given to the proposed retail function of the areas that fall outside of the defined city centre, including Bath Western Riverside East.</p> <p>Policy should take a more conservative approach to any possible expansion of the city centre, unless it can be shown that there is sufficient demand for additional retail space and that its provision will not cause harm to the role and function of the existing city centre.</p> <p>Policy should be towards consolidation and improvement of the existing retail offer, as opposed to expansion and possible dilution. Significant comparison retail in this area will dilute the city centre offer and should be resisted.</p> <p>Some specialist retail could be introduced, such as an expanded market quarter in and around Green Park Station.</p> <p>No planning or design reasons to prevent businesses such as Homebase being incorporated within a redevelopment scheme for WRE through a new modern store that meets their customer and operational requirements and is viable. The Policy or allocation should confirm this and set out the parameters and/or criteria that will be adopted in assessing the compliance of submitted applications with this approach.</p> <p>Evening economy not appropriate beyond existing areas.</p> <p>An evening economy distant from the city centre would dilute the city centre offer, which is essential for the vitality of the city. Mixed development with a minority element of residential would ensure 24 hour occupation and avoid the night-time desolation associated with monocultural office zones.</p> <p>Reflect the agreed Proposed Changes to the Draft Core Strategy specifically in relation to the</p>

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	<p>need for any applications to include a comprehensive approach and to assess the ability to accommodate existing businesses and only when it is determined that they are not compatible or viable within the proposed development, to consider relocating those businesses elsewhere within Western Riverside or nearby in the Lower Bristol or Twerton Riverside areas.</p> <p>If found to be incompatible or unviable, the Policy or allocation must also set out the parameters and/or criteria for any search of alternatives sites and how the proposed development could secure the relocation of businesses through the grant of planning permission.</p> <p>Consideration should also be given to the inclusion of a site or sites that the Council in principle and in land use planning terms consider acceptable for relocated retail use and/or for businesses from WRE.</p> <p>Concern re pepper-potting mixed uses across the whole site. Zoning of BWR East uses into distinct areas should be considered to achieve an appropriate solution, e.g. residential located near existing residential.</p> <p>BWR-East also appears to be a good location for a multi-storey car park, and it is assumed that the logical site for this would be on the Pinesway site.</p> <p>Car parks could be built up compensating for this by designing in some open public realm through the process</p> <p>Car park, surface car parks preserve a degree of openness. They are not just valuable real estate. If they are largely replaced with buildings (no doubt ponderous in scale) the character of the city will become overpoweringly monumental and uniform – stretching from Western Riverside to Southgate. Cllr Webber.</p> <p>Concern too much emphasis is being placed on integrating the whole of BWR East with the Central Area. The southern limits to Lower Bristol Road are remote and here the consideration may be more one of how to integrate with the local area. Integration with surrounding residential communities to be a key issue.</p> <p>Seymour Street presents a significant and hostile barrier to the continuity between BWRE and James Street West leading to the city centre, and needs an improved pedestrian crossing to maximise footfall into the new development.</p> <p>Produce different policies for distinct areas or provide a hierarchy of strategies. E.g. WHS Setting SPD and Building Heights Strategy should be prime considerations for Green Park Station area inc. Norfolk Buildings and James St West (+ associated Georgian townscape of New King St and Gt Stanhope St)</p> <p>City of Bath WHS Setting SPD, Bath Building Heights Strategy, Green Infrastructure Strategy and Bath Flood Risk Management Strategy and other issues need to be given weight.</p> <p>Protect all historic buildings and their settings whether they are located within the site at Green Park or in close proximity at Norfolk Crescent, Nelson Place West, New King Street, St James Cemetery, Victoria Buildings etc. Protect strategic views.</p> <p>The setting of the Green park canopy, and the terrace at Norfolk buildings, must be respected and preferably enhanced by appropriately designed interventions.</p> <p>Removal of the gyratory would be welcome if it would improve the traffic flow, and release some space. The new pedestrian crossing lights have added significantly to westbound traffic delays.</p>

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	<p>More focus on public transport, in particular relation to Sainsbury's is needed.</p> <p>Providing a specific route for public transport through the BWR-East site is unnecessary, although stronger emphasis on walking/cycling would be beneficial in terms of the overall permeability of the site.</p> <p>EA concerns – former application proposals were too close to the river corridor, resulting in obstructed flooding conveyance, limited access, and damage to the riverside habitat at this location.</p> <p>Any new proposals put forward should seek to improve riverside access, enhance riverside habitat and look for opportunities for further improvement of the flood flow conveyance of the river.</p>
SB7: Bath Press	<p>The Bath Press site enjoys good accessibility. In this context redevelopment of the site can support a range of uses including employment, retail, residential and leisure. Such uses must complement the surroundings and the forthcoming development at Bath Western Riverside East.</p> <p>These areas should be retained for business and industry, not given over to housing.</p> <p>The alternatives (to Tesco) might include creative industries, or an enterprise zone to foster hi-tech and other start-ups, in association with one of the Universities, both of which would welcome closeness to Oldfield Park and to the station.</p> <p>Support for the promotion of business led development across the area as a whole, subject to a reasonable level of flexibility in respect of the proportion of business space required on individual sites. This approach should ensure that all schemes remain viable.</p> <p>A masterplanning approach is not essential for the entire Bath Press site. Existing development along the Lower Bristol Road is fragmented and various. Some of it is quite good and its variety provides visual interest. The distinctive façade of the interwar factory is of local significance and worthy of retention. (Cllr B Webber)</p> <p>A comprehensive approach to development at the site offers the best prospect of securing a holistic development, which complements its surrounds and can provide public benefit. By approaching the site in this way, improved public realm, access and architectural treatments can be secured.</p> <p>Any plans for the Bath Press site must not exacerbate congestion around Windsor Bridge junction.</p> <p>Do not believe that the policy should specifically require protection of the north westerly views.</p> <p>No objection to the Bath Press facade being retained in any new building, but it should be incorporated, not just left as a freestanding wall</p> <p>The majority of the respondents to previous proposals suggested that the retention of the historic section of the façade (eastern end) and the chimney were desirable but not essential. We believe that the retention of these elements will help any new development to retain a connection to the past, but should not be an absolute requirement within the Placemaking Policy</p>
SB8 Roseberry Place / Dairy Crest / Stable Yard	<p>The statement that this area contains "under-utilised sites providing significant development opportunities for employment led regeneration" does not reflect accurately the draft Core Strategy. The draft Core Strategy recognises that "Twerton Riverside has contracted as an</p>

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	<p>industrial location in recent decades". Newbridge Riverside is to remain the core industrial location, Twerton Riverside potentially providing "additional flexibility".</p> <p>The Core Strategy advises that Twerton Riverside "is suitable for a broader range of uses" and sees scope to redevelop the area to provide new business (B1a-c) premises and housing, suggesting it will therefore be necessary to maintain an appropriate level of land in the area generally for B1c uses alongside office uses and housing.</p> <p>The Roseberry Place site is recognised in the draft Core Strategy as a key regeneration site in Twerton Riverside. It has been the Council's policy to seek mixed use regeneration in the Roseberry Place area for many years through the adopted local plan.</p> <p>It is recognised in the draft Core Strategy that the eastern part of Twerton Riverside, including Roseberry Place, lies in close proximity to the Western Riverside Policy Area which will experience a significant uplift in its environmental quality and which will act as a catalyst for investment in the wider area.</p> <p>The precise balance of uses is more properly a matter to be considered by individual applicants for planning permission having regard to the Council's policies and the spectrum of commercial and design considerations involved.</p> <p>The site can be developed now, the control of the site having been unified. No purpose is to be served by incremental development and there is no basis for the Placemaking Plan to control the phasing of development</p> <p>Early design work on development proposals for the site confirm that there are good opportunities to create new connections to the river and to enhance the cycle and pedestrian network existing in the wider area.</p> <p>Connections to the southern bank of the river are desirable to open up views of the river and the northern side of the city. However, it is not essential to replicate throughout the length of the southern bank the towpath walk on the northern bank. Riverside walkways can pose security problems for homes and businesses which back on to the river. If they erect high fences or walls, these can become targets for graffiti. In the absence of a riverside walkway, homeowners and businesses are more likely to plant gardens running down to the water, which can be most attractive when travelling on the river or viewed from the towpath on the north side. Even occasional high commercial buildings rising 'cliff-like' from the water's edge can add drama and contrast to views from the northern bank. (Cllr Webber).</p> <p>This site falls partly within Flood Zone 3. The likely loss of flood storage from redevelopment of this site has been taken into account as part of the Bath Quays Waterside flood conveyance project. When the phases of this project are fully delivered it should therefore help to enable this site coming forward. However on site ground raising or defences will still be needed to be delivered to ensure any new development is safe. For information a disused railway embankment forms part of the defence for the site so this will need to be investigated as part of any Flood Risk Assessment for the site. We support the Council view that there is an opportunity to deliver Green Infrastructure and habitat as part of development. We would recommend built development is set back at least 8 metres from the river bank to allow access to the river corridor and habitat creation opportunities. Given the brownfield nature of the site any risk associated with contamination would also need to be addressed.</p> <p>Good opportunities to deliver elements of the Council's Green Infrastructure Strategy, to enhance the natural riverbank and to create new habitats.</p> <p>Protect key views across the site from Windsor Bridge and the connecting views to hillsides.</p>

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SB9 : Herman Miller / George Yeo (Lower Bristol Road)	<p>Would like to see a master-planned approach for the whole of the southern bank of the river from Windsor Bridge to the western edge of the city. This would offer the best chance of securing an appropriate mix of uses and a joined-up approach to the important infrastructure issues, particularly flood mitigation, traffic and transport and use of the riverside for leisure and amenity purposes</p> <p>FoBRA urges ownership problems to be resolved and the building brought into use, either as a supermarket, or perhaps as a museum or exhibition centre.</p> <p>Believe that the listing of the Herman Miller building is mistaken – whilst the building might have been innovative in its first use of a space frame roof structure, the building is contextually hostile and greatly underuses this important site. We would support de---listing to free up a much more dense and valuable development.</p> <p>The Environment Agency has previously commented on planning application 10/04926/FUL for a Lidl supermarket at this site and recommended conditions including a buffer strip, river access, landscape and habitat creation.</p>
SB10: Twerton Riverside West / Carrs Wood	<p>Twerton Riverside West houses a number of end-of-life industrial premises and unsightly businesses.</p> <p>Priority should be given to retaining and enhancing businesses which employ skilled and semi-skilled workers.</p> <p>New industrial would not be an attractive proposition, especially as development in Bath must be of a high quality, which will raise the build cost over developments in less sensitive and better connected locations</p> <p>It might be possible to integrate a minority of residential development to cross-subsidise industrial premises. Policy support and enabling funding probably needed for light industry.</p> <p>BPT would like to see a master-planned approach for the whole of the southern bank of the river from Windsor Bridge to the western edge of the city.</p> <p>Twerton sluice. The operation of Twerton gate is critical in flood conditions as it enables flood waters to be evacuated from the city quickly. It is likely that the gates will need to be replaced in the near future. The built area in the riverside corridor upstream of Twerton Gate all benefit from its operation, including any new development that comes forward. Contributions from new development or other funding streams are therefore needed to enable works. This development requirement needs to be referred to in PMP for the Twerton and Newbridge Riversides area.</p> <p>The river corridor through this part of the city is more natural compared to parts of the city. Any proposals in this area should seek to enhance existing and create new riverside habitat, ensuring built development is set back from the river bank and suitable margins provided. Any proposals, including any new bridge structures, would need to ensure flood flows are not impeded or the natural floodplain encroached into.</p>
SB11 - Locksbrook	<p>Aware that their buildings are well past their sell-by date and present a significant hurdle to daily operation. Premises will need to be redeveloped shortly to meet the needs of businesses' futures -tempting companies to move to much better connected and dedicated industrial locations, with resulting loss of valuable jobs.</p> <p>Recommend that the Council engage closely with the existing businesses to ensure that employment is not lost.</p> <p>Employment uses in particular Rotork, Herman Miller and Horstmann should be retained.</p>

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	<p>Significant opportunities for economic development and environmental enhancement.</p> <p>Support use of disused railway line as a pedestrian and cycle route in to the Bath Riverside area.</p> <p>The cycle path should be extended, hopefully all the way into and through the Western Riverside housing. Unlike the rapid transit scheme which was planned to cross Windsor Bridge Road at grade, the cycle path could (if it were steeper or dog-legged) bridge Windsor Bridge Road. (Cllr B Webber)</p> <p>Questions whether there is scope to segregate cyclists from pedestrians for important stretches of this east-west corridor. Where there is no alternative to a shared path, it should be made wide enough for all users to feel safe. Segregation and widening is a policy which should be followed wherever such paths exist or are contemplated.</p> <p>Flood defences is a key issue for this site.</p> <p>Significant opportunity to improve the connectivity and biodiversity of the river corridor in this location. An appropriate margin to the riverbank should be included to allow improved access and river corridor improvements.</p>
SB12: Brassmill	<p>These two areas offer significant opportunities for economic development and environmental enhancement. The disused railway line is an under-utilised asset: any decision to dedicate it as a pedestrian and cycle route in to the Bath Riverside area should be taken in the context of a comprehensive transport strategy for the city as a whole.</p> <p>See above re SB11 Locksbrook for info on redevelopment of businesses.</p> <p>The opposite bank of the river is quite natural at this location so this should be reflected in the redevelopment of the site, with habitat creation along the river margin being a key outcome.</p> <p>Loss of flood storage from redevelopment of this site has been taken into account as part of the Bath Quays Waterside flood conveyance project, so the site can be raised where required, with the exception of the riverside margin.</p>
SB13 – Bath's Neighbourhoods- Generic Issues	<p>The map on page 25 does not show neighbourhoods, it shows local centres. This needs to be clarified and neighbourhoods added to the map.</p> <p>Consideration of areas without an identifiable local centre e.g. upper Lansdown needed.</p> <p>The neighbourhoods should continue to be areas with a variety of uses, in the interests of sustainability and community</p> <p>Viable small employment sites should be defended against residential developments.</p> <p>Someone wishing to start up a small business (office/professional services) in a dwelling should not be frustrated simply by rigid policies concerned with safeguarding housing supply.</p> <p>A shared vision covering all these very disparate sites seems unrealistic. It may be possible to identify some generic criteria after carrying out a site-by-site analysis</p> <p>Bath's central area is a 'neighbourhood centre' in its own right and its residents and interest groups as well as businesses need to have the opportunity to contribute to the placemaking process through structured consultation.</p>
SB14 Local Centres	<p>Doubts that formally categorising different types of Local Centre helps. The important question is whether they are still viable. If the centre is still valued by the local community, it should be protected against intrusive changes of use. If, however, the centre is fundamentally</p>

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	<p>redundant, it should be helped to adapt or even to die by permitting appropriate changes of use.</p> <p>Needs to consider in more detail the role and function of these neighbourhoods and, in particular, the local centres. Some neighbourhoods are focused around shopping centres others have different roles and functions.</p> <p>It is important that a clear hierarchy is established and consolidated.</p> <p>Struggling centres need to be prioritised within a framework of wider regeneration. Many of the local centres are no longer effective (e.g. Lansdown Road, Camden Road & Fairfield Park, London Road).</p> <p>There is no sense of Central Bath as a whole, or as a neighbourhood.</p> <p>Bear Flat centre performs an important functions for the surrounding community. Bear Flat should be protected and improved as a centre the provision of local shops added.</p> <p>A shared vision covering all these very disparate sites seems unrealistic. It may be possible to identify some generic criteria after carrying out a site-by-site analysis. Each centre needs to be handled on its own merits.</p> <p>Shop fronts of listed buildings, which are no longer viable as shops, should be permitted to change to reflect the new use – which often may mean reverting to the building's original appearance as a dwelling (if known) or to a reasonable pastiche. Residential properties fronted by long-disused shop windows often appear neglected and out-of-place.</p> <p>There are too many shops that are badly converted to residential (though possibly without proper approvals). Change of use to residential ought to be encouraged (or at least facilitated as an option) in such areas.</p> <p>Environmental improvements should implemented only as be part of wider economic regeneration.</p>
SB15 Major Sites	
SB15- University of Bath	<p>A new Masterplan needs to be discussed wider than just with local residents. The importance of the University, and its sensitive location means that the consultation should be city-wide. Consider that expansion plans may require looking at additional solutions in or beyond the city.</p> <p>Questions reference to the development of student accommodation on land removed from the Green Belt-states that “there has never been any agreement to allow student accommodation on the land removed from the Green Belt.”</p> <p>The building heights policy should apply particularly to anything built at Claverton Down.(FOBRA)</p>
SB15 Twerton Park	<p>It is questionable whether a ‘statement’ by Bath City Football Club provides sufficient certainty that Twerton Park will be available for redevelopment bearing in mind the lengthy process involved in identifying and procuring a site for relocation of the Stadium</p> <p>Commercial /employment use would be more important than more retail or residential in this location.</p>
MoD sites / Warminster Road and	<p>Support allocation of sites within PMP. PMP will be afforded more weight in the determination of planning applications</p>

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Foxhill	<p>Flexibility is needed so that development requirements are not unduly restrictive, or have the potential to restrict the capacity of development on the site. It is not for the PMP to set a prescriptive quantum of development for the MOD sites. This should be being guided by on-going site assessment work which is feeding into the planning application process.</p> <p>Concern as to the degree to which the PMP will refer to and rely on Concept Statements - they should refer to these as a 'guide only' given that the Concept Statements are now a year old and the planning policy and further survey work has been updated.</p> <p>Concept Statement's vision to deliver approximately 100 no. dwellings on Warminster Road site is an underestimation of what can realistically be achieved at the site Square Bay (Bath) Ltd are currently engaging in pre- application discussions for a scheme comprising approximately 250 no. residential units and a 65 bed care home [at the time of writing].</p> <p>Greenway Lane Residents Association is concerned at the effects of developments currently being considered to the MoD site at Foxhill, both from a 'skyline' angle and traffic impact angle.</p> <p>Need to encourage integration with the local area by interlinking the existing streets with those created on MoD Foxhill site.</p> <p>The majority of these sites are located in Flood Zone 1 and away from the river, therefore the use of sustainable drainage techniques would be our main priority. In relation to the MoD sites it is likely that previous uses have resulted in contamination that may pose a risk to human health and the water environment.</p>
Other Major Sites	<p>Hope House and its grounds should perhaps appear in this section.</p>
SB16: New areas of development adjoining the City – Ensleigh & MoD Ensleigh	<p>General support for the principle of development at the site, and upon the Royal High School playing fields.</p> <p>Opposition to allocating Green Belt sites adjoining the city boundary before all brownfield development land has been exhausted.</p> <p>Request that the Council continue to give consideration to the Kingswood Foundation land interests in any further reviews of this designation and the requirement for additional land.</p> <p>Scale of development and aspirations set out in the Concept Statement is unachievable and would result in overdevelopment. Lead to significant negative impact on the landscape around Ensleigh and an unacceptable form of development and environmental harm. ARUP supporting study recognise this position and seek to increase the land take accordingly. Council must take a balanced approach between the delivery of housing numbers and the provision of development set out in this policy to achieve a high quality, sustainable mix of development.</p> <p>Concern that the housing density proposed is significantly higher than that in nearby streets.</p> <p>Challenge the aspiration to deliver a primary school on site. Proposed residential development generates less than 50% of the suggested pupil occupation of the primary school, hence contrary to Regulation 122 of the Community Infrastructure Levy. Seeks to remove the recommendation for delivery of a primary school at MoD Ensleigh and re-provide this on Council owned land adjacent to Ensleigh.</p> <p>Challenge the requirement for employment development. No evidence base to support an employment requirement at Ensleigh North. Retention of this aspiration will sterilise development on the site.</p>

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	<p>Request that the contents of the Concept Statement are reviewed in conjunction with the landowners and their development partners. Request that revised concept plan be consulted upon as part of the PMP.</p> <p>The top of Lansdown is a very blank area, albeit pleasantly leafy. Can the Ensleigh project help to bring life and local services to it? /need for community facilities including a convenience store/or would this lead to sprawl?</p> <p>Close attention must be paid to public transport connections to the city centre, to secondary schools and the RUH.</p> <p>Need to draw up and implement comprehensive planting schemes for the site boundaries at a very early stage so that trees can become established before the site is fully developed.</p>
SB17 New areas of development adjoining the City at Odd Down and Weston	<p>Opposition to allocating Green Belt sites adjoining the city boundary before all brownfield development land has been exhausted</p> <p>Odd Down – supportive generally of the 40% affordable housing target for this part of B&NES, 30% is more appropriate at Odd Down, taking account of the provision of infrastructure and development requirements.</p> <p>Odd Down – seek to incorporate a higher level of housing than the 300 currently envisaged in the Core Strategy - optimistic that the scope of the site to deliver nearer to 1000 will be recognised</p> <p>Weston - EA - There are existing surface water flooding problems in Weston, as water flows off the steep slopes towards the high street and centre of the village. Funding has been secured to implement a flood prevention scheme in Weston. Any new development would therefore need to be delivered in combination with flood prevention measures.</p>
SB17 – other sites	Minster Way & Horseshoe Walk, Bath should be allocated in the PMP. Promoters await outcome of Core Strategy.
SK1 Town Centre	Support for Council's vision for Keynsham; including its enhanced role as a service and business centre and the proposed improvements to the town centre.
SK2 Somerdale	
SK3 Ashton Way Car Park	The importance of retaining car parking, which is already under pressure in the town, to support the town centre, may preclude the availability / suitability of the site for development.
SK4: Riverside And Fire Station	This site is currently unavailable, and there is no certainty that the existing occupier will relocate during the plan period
SK5: Broadmead/ Ashmead /Pixash Industrial Estate	<p>This is an existing, intensively developed and occupied site, and is unlikely to contribute significantly to accommodating requirements for new development during the Plan period.</p> <p>EA - The site falls partly within a high flood risk area from the Broadmead watercourse and we have records of it flooding in 2000. Given the size of the site, opportunities should be sought to redirect new development away from the flood risk area. Through this there would also be an opportunity to open up and restore the culverted Broadmead watercourse to create a more natural channel; this would then be an asset to local businesses in the area. For information Broadmead Lane to the north of the railway also floods frequently. This would</p>

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	need to be taken into account when considering the future access requirements for any new development.
SK6: Keynsham – land adjoining east and south west Keynsham	<p>See General Plan role re in principle objections.</p> <p>Keynsham Spatial Strategy Diagram -</p> <p>The diagram should identify the location of the strategic development opportunity at East Keynsham .</p> <p>PMP could have explored options for different scales of development at the strategic locations.</p> <p>Essential that any adjustment of Green Belt boundaries at Keynsham are made having regard to longer term development requirements.</p> <p>The Trust's Abbots Wood (OS grid ref: ST 645 672) is a valuable and well used local community green asset. It is already being constrained by the likely impact in terms of increased usage and visitor pressure from the BANES/Barratt Homes development to the west and the Taylor Wimpey development to the east. Any further development adjoining this site in the Green Belt is likely to lead to the overwhelming use of the wood as a green infrastructure asset and its significant degradation.</p> <p>EA refer to previous Core Strategy representations in relation to development in this area given the existing surface water flooding problems. Any new extensions in this area would need to resolve existing flooding, particularly if it is intended to use Parkhouse Lane as access.</p>
SK7 Local Centres	No comments
Sites: Comment on Somer Valley sites in general	<p>See SSV7 for further comments re distribution / sites.</p> <p>The Council cannot demonstrate a deliverable five year housing land supply. In light of this, unallocated sites should be brought forward now to address this matter</p> <p>To state that new housing will be primarily focused on what is essentially infill and windfall development, which has already been considered when arriving at the extremely low level of proposed housing growth, is not appropriate</p> <p>No reference to the need to allocate sites, including potential Greenfield land, for employment use in the Somer Valley. Given desire to improve the self-containment/ and job creation of this area it needs to be made clear that land will need to be released to accommodate this.</p> <p>General objective of improving the self-containment of settlements must be balanced against the acute need for housing. Significantly more land needs to be released for development in the Somer Valley</p> <p>Recognition of the need to enhance green infrastructure connections and biodiversity value within and between development sites is very positive</p> <p>Coal Authority - an assessment should be made of the likely impact on mineral resources, including coal. This will help to ensure that any potential sterilisation effects (along with whether prior extraction of the resource would be appropriate) are properly considered in line with the guidance in paragraphs 143 and 144 of the NPPF. Given that coal mining legacy is most prevalent within the south of the LPA area, these checks undertaken by the LPA should particularly apply to proposed Development Sites in the Somer Valley</p> <p>Critique of allocated brownfield sites –and advise that there are a number where the</p>

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	<p>environmental or technical constraints raise significant doubts over their deliverability. There is a need to balance the aspirations for regeneration of previously developed land with the certainty of delivery on Greenfield sites.</p> <p>Essential that the proposed commercial units and Retirement Village on the Bovis part of the Polestar Purnell site are completed and operational as these will offer sustainable employment opportunities for Paulton and other neighbouring residents.</p>
SSV1: Midsomer Norton Town Centre Sites	<p>Important that policy prevents any further loss of essential employment land within the town centre to residential use. If allowed to continue, will decimate the vibrant economy within the town centre. It also has perverse effect of driving new employment provision towards greenfield edge of town sites</p> <p>PMP should include proposals to retain and enhance the existing supermarket and associated facilities in The Hollies in conjunction with environmental improvements in the High Street and redevelopment of the South Road Car Park.</p> <p>A redeveloped and enlarged supermarket in The Hollies, in conjunction with a new supermarket at South Street, would address a quantitative need for additional supermarket floorspace in Midsomer Norton and Radstock as identified in GVA Grimley's 'Retail Floorspace Quantitative Need Assessment Update 2011'. It would also help to fulfil qualitative needs for the physical regeneration of Midsomer Norton Town Centre and the enhancement of its retailing and other facilities.</p> <p>EA- This site falls within Flood Zone 1 (low risk) due to the presence of the flood relief tunnel. This takes flood flows from the River Somer, preventing widespread flooding in the town centre. If there is significant regeneration of the town centre it would therefore be worth proposals ensuring that the tunnel will still be fit for purpose for the lifetime of the development, given the expected increase in flood flows due to climate change. We would therefore request this is included as part of the PMP plan policies for the town centre.</p>
SSV2: Midsomer Norton – South Road Car Park	<p>Support the proposals to deliver a new convenience store at South Road Car Park. Urge the council to accept that additional housing development at Midsomer Norton, which is not simply restricted to limited infill development – will result in increased potential consumer spending in the town and will assist in delivering this policy</p>
SSV3: Midsomer Norton – Town Park	<p>Clear evidence as to the park's deliverability is needed.</p> <p>The River Somer runs through the centre of this site. The delivery of the town park should therefore include consideration of potential habitat improvements to the river corridor.</p>
SSV4: Midsomer Norton – Welton Packaging Factory	<p>Landowner considers that the site remains appropriate for a mix of residential and employment generating uses (and as expanded upon subsequently retail development forms an employment generating use).</p> <p>Initial Masterplanning work has indicated that the site is suitable to accommodate some residential development alongside a foodstore (circa 4,500sq m).</p> <p>Consider this location is well located to other facilities within Midsomer Norton Town Centre and would encourage linked trips, thereby strengthening the centre's retail function.</p> <p>Development would enable a number of community improvements to be delivered, including significant enhancements to the gateway to the town centre, and improved pedestrian links to the High Street, further promoting linked trips.</p> <p>The housing yield of 150 units that has previously been identified for the WBB site within the</p>

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	<p>Council's SHLAA 2013 is not underpinned by any robust evidence.</p> <ul style="list-style-type: none"> - Consider the assumed residential capacity of the site to be too high. The site offers limited scope to provide larger houses suitable for families given its size, location and previous usage. Recommend that this site should be redeveloped for employment generating uses in the first instance with some high density residential development in the form of apartments being the most appropriate secondary use for the site. -it is essential that such large employment sites within the town centre are not lost to housing especially to 100% housing. It may be in this case that a small proportion of the site should be identified for housing in order to facilitate the delivery or retention of the remainder as employment <p>EA - The redevelopment of this site offers a major opportunity to deculvert the river that currently runs underneath the site. This could be restored to mimic the upstream natural sections through the site, and provide habitat creation/enhancement. As well as offering a significant local asset for the final development, this could also help contribute towards achieving Water Framework Directive objectives for this watercourse. We would also look for any development coming forward on the site to be set back from the river corridor, outside of the floodplain. This would avoid the need for costly flood risk mitigation or flood storage compensation to be provided.</p>
SSV5: Radstock Town Centre Sites	<p>Unless the Council are in possession of clear evidence demonstrating that the sites are available and can be brought forward as a whole, there remains considerable doubt regarding the delivery of additional dwellings</p> <p>Need to consider Radstock Railway Sidings and its development area (Avon Wildlife Trust).</p> <p>Land within the town centre is partially located within flood risk areas 2, 3a and 3b. The mitigation required to alleviate concerns over flooding can be costly and, in some instances, require third party land. Given that there is land which is suitable and available for development outside of these areas, the Council must undertake sequential and exceptions tests where appropriate in accordance with the NPPF.</p> <p>EA - opportunities to enhance and protect the river network in the town should be encouraged. The river network in the town centre also has an important flood risk function, with works undertaken to improve the standard of protection in this area. This should be considered by any proposals coming forward.</p>
SSV6: Radstock – Coombend	<p>To date, no assessment has been undertaken into the suitability and capacity of Coomb End to accommodate additional development.</p> <p>There are a variety of land uses and landownerships which could impact on the delivery of residential development in this location.</p> <p>There is considerable uncertainty over the deliverability of land within SSV6, particularly for the immediate 5 year period; a view which is consistent with the recent Core Strategy Hearing Examination notes.</p> <p>Highway access and traffic impact issues raised as set out in SHLAA.</p> <p>Flood risk is a serious consideration for any development coming forward in this area, due to the steep nature of the watercourse at Coombend. A more significant issue is that the culverted sections of this watercourse built in 1880's are structurally failing. Reinforcement works within the existing culvert scheduled. Depending on the location of any new development it may be appropriate for a contribution to be made towards the costs of these</p>

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	<p>works (already funded and scheduled). We would also expect any built development to be set back from the new culvert, to ensure its structural integrity is not affected.</p>
SSV7: Additional Housing in the settlements within the Somer Valley – general principles	<p>Launch Document could have been more proactive in providing guidance on the location of available and suitable alternative sites to meet the identified need</p> <p>Object to the reference that only 300 additional dwellings are required for the whole of the Somer Valley to meet its needs for the 20 year plan period. Such an allocation is woefully inadequate and would be unlikely to meet the affordable housing needs for this area, let alone the demand for open market properties. In light of this the Council should be planning for at least 800 new dwellings to be provided in the Somer Valley over and above existing commitments.</p> <p>The Policy should recognise that the Council has already granted planning permission for 165 dwellings on land south of Midsomer Norton at Charlton Park</p> <p>The majority of housing allocation for the Somer Valley area should be focused on Midsomer Norton to strengthen its role as the principle centre for the Somer Valley area and in recognition of it being the third biggest settlement in the district.</p> <p>Midsomer Norton is the current nucleus for economic activity for the southern part of BaNES and thus logically the most sustainable location for growth over the plan period.</p> <p>Curo agrees with the proposed roles of Midsomer Norton and Radstock. There does, however, remain scope for the Council to amend the housing boundaries for a number of settlements in the Somer Valley including, for example, Paulton and Peasedown St John</p> <p>Due to the fact that Paulton's population will have increased by circa 30% as a result of the current planned developments, Paulton Parish Council will object to any further applications for residential development outside the HDB.</p> <p>Each of the settlements should make some contribution. The amount of development in each settlement should take account not only of the size of each settlement, but also the proximity to key services and facilities.</p> <p>We would envisage a combined mix of smaller and larger development proposals in order to deliver housing need within the plan period on a phased basis and to ensure natural growth is created of a varying nature.</p> <p>Housing Development Boundaries (HDBs) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.</p> <p>It is important that Haydon is included in any future review of Somer Valley development boundaries because it is a settlement of considerable size, benefiting from a number of services, and is host to a substantial industrial estate. It is also within close proximity of Radstock town centre, and to the newly rebuilt St Nicholas C of E Junior School, with good footpath links to Radstock.</p> <p>With regards to the wider question of where boundaries should be amended, any review should take account of the following factors in particular:</p> <ul style="list-style-type: none"> • Proximity to existing services and facilities; • The extent to which there would be an extension into truly open countryside (e.g., sites which 'square off' existing boundaries would be preferable'); • Avoidance of ecological designations;

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	<ul style="list-style-type: none"> • Ability to add to the interpretation of the historic environment; • The ability to bring forward wider benefits to existing residents. <p>The Somer Valley is characterised by a rich mining heritage and also has a distinct architectural character reflecting that heritage and the geology of the area. These factors should influence the design of future development.</p> <p>It is essential that the proposed commercial units and Retirement Village on the Bovis part of the Polestar Purnell site are completed and operational as these will offer sustainable employment opportunities for Paulton and other neighbouring residents.</p>
SSV7: Additional Housing in the settlements within the Somer Valley – SITES	<p>Most sustainable solution would be for larger deliverable site capable of meeting all of the infrastructure needs. A larger number of small piecemeal schemes are very unlikely to be able to deliver the infrastructure needed.</p> <p>A major landholding controlled by Strategic Land Partnerships (MSN 31) is able to offer solution including some land which falls just within Mendip District Council. Mendip DC have recently agreed that the Bath HMA extends into Mendip in this area. Duty to Co-operate needs to be complied with</p> <p>Paulton Builders' Merchants Ltd site on the northern edge of Radstock Road. The land should be considered in the context of a revised Vision for the area for a mixture of economic uses that balance the economic, social and environmental benefits.</p> <p>Sites below considered appropriate location for future housing development. Evidence covering all site related aspects enclosed within reps – not repeated here.</p> <p>Land West of Kilmersdon Road, Radstock (RAD 31B and RAD 31C).</p> <p>Land East of Greenlands Road, Peasedown St John</p> <p>Greenlands Road, Peasedown St John for development (in line with application.)</p> <p>Land West of Northmead Road, Midsomer Norton (MSN 23)</p> <p>Land at Boxbury Hill, Midsomer Norton (MSN 27)</p> <p>Land at Abbotts Farm Close, Paulton</p> <p>Land at Thicket Mead, Midsomer Norton (MSN 24A and MSN 24B)</p> <p>Monger Lane, Midsomer Norton</p> <p>Land at Chilcompton Road, Midsomer Norton</p> <p>Land between Knobsbury Lane and Frome Road, Writhlington. (ref 13/01709/OUT). Appropriate to include the site as a formal allocation in order to provide greater certainty.</p> <p>Land at Manor Farm, Writhlington (reference "Rad 25" in the Council's SHLAA).</p> <p>Land between Maple Rise and Magdalene Road (reference "Rad 23" in the SHLAA)</p> <p>Land rear of Maple Rise "Rad 22"</p> <p>Land near allotments at Haydon Rad 32</p> <p>Land at Kilmersdon Road / Haydon Hill</p> <p>Land North of Radstock (RAD16a and RAD16c)</p> <p>Land South (PEA10) and South West of Peasedown St John –</p> <p>West of Northmead Road, Midsomer Norton - SHLAA May 2011 (ref MSN 22) and March 2013 (ref MSN 23).</p>
SSV8: Westfield	<p>Westfield- additional land should be identified for growth of the industrial estate.</p>

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SSV9: Paulton – Old Mills	<p>Paulton PC (PPC) wishes to encourage more employment opportunities commercial and industrial. This could easily be achieved within the existing commercial buildings at the Old Mills site.</p> <p><i>PPC vision for this area - Employment opportunities only - both commercial and industrial.</i></p> <ul style="list-style-type: none"> • <i>How can employment best be secured?</i> Utilising the existing commercial buildings .. ensuring that the commercial and retirement village are built on the Polestar site, creating jobs. The formerly redundant offices on the Old Mills site have been marketed for two years and the owners have secured tenants for approximately a third of the building. PPC met with the agents to explore potential uses and tenants for the remainder of the office building. The warehouse is also being marketed. • <i>Should a mix of uses be allowed on this site as part of a comprehensive scheme and to enable its delivery?</i> <p>No, a mix of uses should not include residential development. PPC must be involved in Development Brief for this site.</p> <ul style="list-style-type: none"> • <i>What opportunities are there for renewable energy?</i> <p>Both existing buildings on the site have roofs that are suitable for potential solar energy installations</p> <p>The mechanism for delivery of this employment land should be through the CIL. No other development or mix of uses should be considered on this site. It is in an unsustainable location, remote from the town centre.</p>
Rural Areas: Comment on sites in general	<p>Curo agrees with the focus of additional housing development in the more sustainable villages with a range of key services and facilities.</p> <p>Curo concerned to ensure that there is sufficient opportunity to meet current and future affordable housing needs in rural areas. Important to review development boundaries especially in Green Belt locations; and to encourage clustering of functionally related parish areas in order to establish 'local connections' for the purpose of establishing local housing need.</p> <p>Objections to the Council's continued insistence on seeking to arbitrarily limit the amount of development in the RA1 villages to "around 50" dwellings and limiting development in RA2 villages to "around 15" dwellings in the plan period. Could result in sub-optimal development on sites that are acceptable for development in principle, but which can accommodate more than the 50 or 15 dwellings.</p> <p>All potential allocations in RA1 or RA2 settlements should be assessed on their merits and without artificially limiting the quantum of development. The amount of development will be limited by such factors as: highways impact; visual impact; accessibility etc.</p> <p>Developments within the RA1 and RA2 settlements could make a significant contribution towards new or improved local services and facilities. By seeking to artificially limit the amount of development, the contributions delivered may not be sufficient to bring forward any meaningful improvements.</p> <p>Object that policy does not identify any rural settlements where development can be accommodated. PMP provides no certainty as to the spatial vision for the Rural Areas in terms of the delivery of housing.</p> <p>The Kennet & Avon Canal is important feature in the landscape. It should be recognised as a</p>

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	<p>valued multi- functional asset not just within, but linking communities offering - most important green infrastructure asset in the district, providing wildlife habitat, sustainable transport routes and a free recreational facility.</p>
RURAL 1: Rural Areas	<p>See representations for details.</p> <p>The following sites are promoted for development in the PMP.</p> <ul style="list-style-type: none"> Land North of Wells Road, Hallatrow c 135 new dwellings Land at Lippiatt Lane, Timsbury (TIM 3 on enclosed plan).:c 90 new dwellings Land East of Mill Lane, Timsbury (TIM 7A and TIM 7B c100 new dwellings Cappards Road, Bishop Sutton (BIS 3B) 32 dwellings Land West of St Marys School, Timsbury (TIM 5) c 80 new dwellings Maynards Terrace, Clutton circa (CLU 4) 35 to 40 new dwellings Land South of the A39, High Littleton c 150 new dwellings Land South of Hayeswood Road, Timsbury (TIM 9) 150 new dwellings South of Temple Inn Lane, Temple Cloud (Planning Ref No: 13/03562/OUT) Church Road, Clutton land north of Ashwood Church Lane, East Harptree. Cedar Homes, Retirement homes developer. Land to the north of Pack Horse Lane, Southstoke, Bath. Stokefield Trust West of Leamon Cottage, Compton Martin northern side of the A368 -site a former orchard - Dr A Edwards Manor House and former school provision at Dark Lane Chew Magna - In-Residence GB Estate Land to the rear of High Street, East Harptree E V Currell & Sons
RURAL 2:	<p>To deal with the edge of Bristol under the heading of “Rural Areas” is a misnomer. The SHMA has failed to consider the needs of adjoining areas, and is therefore not NPPF compliant, we believe that there is significant unmet need at Bristol which must be taken into account in the emerging Core Strategy and, thereafter, in the Placemaking Plan. This need is, in our opinion, significantly greater than the 200 dwellings referred to in the emerging Core Strategy</p>

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Policy	Comments / Key Issues
General Comment	<p>Keep in mind the chain of conformity referred to in the Council's current Local Development Scheme: NPPF, Core Strategy, Sustainable Community Strategy and avoid seeking to add an additional layer to higher-order, settled policy.</p> <p>DM Policies should not duplicate or replicate matters that are already adequately covered in the NPPF and/or emerging Core Strategy</p> <p>Sharper focus on what is relevant to Placemaking will assist in ensuring that it quickly becomes a valuable part of the statutory development plan rather than an unmanageable draft</p> <p>Reopening higher-order issues and overly prescriptive detail can act against facilitating the delivery of key development sites</p> <p>Support need for high quality DM policies but introduction to section vague and lacking in urgency</p> <p>Topic areas reasonably comprehensive. suggested topic areas should include reference to '</p> <ul style="list-style-type: none"> • Space Standards • Brownfield before greenfield development • Traffic congestion • Air pollution <p>-protecting the outstanding universal value of the City of Bath WHS in its setting'</p> <p>policies should be positively prescribed, and sufficiently flexible such as not to frustrate development that achieves their objectives as far as is reasonably practicable, but does not necessarily satisfy each and every policy criterion</p> <p>The extant development management policies should be critically reviewed to see whether they could be merged or simplified and/or expressed more broadly in terms of their objective(s)</p> <p>An applicant should not be required to demonstrate exceptional circumstances or material considerations in departure from the Development Plan for proposals which are in <i>prima facie</i> conflict with particular elements of Development Management Policies, and the policy wording should be framed accordingly.</p> <p>Some current policies are too 'black and white' - on occasions contrived justifications have to be found for ignoring the letter of the policy in order to approve a proposal to which no-one has actually objected</p> <p>Concerned that the sheer volume of background information or survey data which accompanies all but the smallest proposals leads to extra expense and delay for developers, just to tick boxes. A topic needs to be discussed and evidenced at length only if is of substantial significance.</p> <p>Refer NPPF para 173 sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened policy DP1 (responding to climate change) and DP3 (securing sustainable design) DP9 (meeting Local Community and Recreational Needs).</p> <p>Crucial the council has an up-to-date evidence base on viability</p>
DP1-	<i>Bearing in mind what the NPPF says about only including policies which give clear guidance to</i>

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responding to climate change	<p><i>the decision maker when considering development proposals, how do you think any further climate change related policies should be framed?</i></p> <p>LPA does not have sufficient resources or expertise to develop fully rounded and costed policies and is more likely to create perverse incentives and disincentives</p> <p>Renewable energy target in the emerging Core Strategy - this is a district/development-wide target and not one that should, or indeed can, be met by each and every development proposal.</p> <p>Renewable energy policies in the Bristol Core Strategy have had a negative and frustrating impact on some developments</p> <p>Should not be a presumption against a proposal, and a requirement to justify it as a departure from the Development Plan, where policy targets and provisions cannot be met. Whilst being aspirational, the policy framework must be realistic and flexible.</p> <ul style="list-style-type: none"> • <i>community-led initiatives for renewable and low carbon energy?</i> <p>like to see a specific reference to the role that trees and woods can play in helping solutions to climate change issues</p> <ol style="list-style-type: none"> 1. Health & Wellbeing - can reduce the impact of the 'urban heat island effect', reduce temperatures, improve air quality through the adsorption of particulates 2. Flood amelioration - reducing surface water flooding, 3. Biodiversity - help wildlife adapt to climate change and other pressures reduce soil erosion and soil moisture loss. 4. As a biomass fuel 5. Wood fuel -Management and Harvesting methods must be undertaken sensitively 6. Use of wood rather than fossil fuel based materials 7. Woodland creation for carbon sequestration - helps remove carbon from the atmosphere would like to see creation of new natural habitats around existing valuable conservation habitats such as ancient woodland, together with a reduction in intensity of agricultural practice, so that species are better able to move around <p>Development of small-scale, local biomass projects such as wood-fuel heat and power minimise the costs and carbon emissions associated with transport.</p> <p>Bioenergy benefits - carbon emitted by burning biomass or biofuels is balanced overall by the carbon taken in by the crops as they grow. However, the carbon and environmental costs of growing, harvesting, transport and processing, need to be taken into account.</p> <p>Burning of woodchip to generate heat, gasification of biomass to produce electricity and the use of second generation biofuels produced from biomass. Emphasise use of woody biomass crops for these purposes, rather than crops such as sugar beet and wheat for the production of biofuels.</p> <p>Promote the use of canal/river water not only for small scale HEP, but also for use in the heating and cooling of buildings</p> <p>Seek more use of wood as a fuel grounded in high standards and sensitive management of trees and habitats.</p> <ul style="list-style-type: none"> • <i>measures to enable development to be resilient to the future climate?</i>

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	<p>Natural England would like to work with Council to explore how their recent climate change vulnerability and adaptation models at the National Character Area (NCA) scale could inform relevant policies and how these would be applied.</p> <p>EA support policy to mitigate climate change - flood maps available in the Council's SFRA Level 2 document could form part of the evidence base for any policies re climate change resilience.</p> <p>Policy should encourage technical solutions to resolve, for example, flood risk or other issues when allocating / considering development proposals</p> <p>Substitution of wood and wood products for other construction materials and for non-renewable energy sources offers a major opportunity for tackling climate change by storing carbon in our buildings and reducing fossil fuel consumption.</p> <p>would like to see tree planting as a key climate change contributor in any development proposal.</p> <p>Ensure development considers all types of alternative power sources prior to submission, with explanations regarding unsuitability if necessary. Ensure all opportunities to deliver low carbon, climate adapted development are exploited.</p> <p>Different site specific standards for sustainable construction could be required based on whether the proposed activity is expected to have high water or energy consumption (EA)</p> <p>Support sustainable construction and renewable energy targets as set out in CS - urges caution on seeking to impose higher local standards on specific sites - viability may be prejudiced if overambitious targets are set.</p> <p>do not feel there is any need for repetition of the clear NPPF policies. These can be left to the NPPF and to Building Control and other regulatory regimes.</p> <p>Core Strategy Policy CP2 provides sufficient policy guidance on sustainable construction and does not need to be supplemented</p> <p>Sustainable development driven solely by the need to reduce emissions must be tested against comparative economics to prevent wasteful 'fads'.</p> <p>Far better to reduce demand by well insulating existing and new properties</p> <ul style="list-style-type: none"> • <i>production, processing, distribution and retail of local food?</i> <p>Support planning applications submitted for Farm Shops and associated services</p> <p>Ensuring that there are appropriate opportunities for local food production (whether this is through sufficient size of gardens, or through the provision and protection of allotments and community gardens) is important. Such measures would help to maintain and enhance the natural setting of Bath and other settlements along with sustainability benefits.</p> <p>Reservations about the climate change benefits of local food. Being small scale, it normally leads to higher emissions than non-local food bought from supermarkets. This is not something the Council should spend our money on.</p> <ul style="list-style-type: none"> • <i>Are more precise boundaries needed for the District Heating Priority Areas?</i> <p>District heating priority areas -Unless there is very clear evidence to suggest that this will not have an adverse impact on the viability or deliverability of any specific schemes this policy should be abandoned. Our evidence suggests that there are no projects likely to be promoted within B&NES which would render district heating viable.</p> <p>District heating provides a seasonal heat sink and is relatively inefficient in heat deployment.</p>

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	<p>Cites Rookery South EfW, Bedfordshire generates 56MW electricity, 120MW heat but only 16MW constant heat demand within the maximum economic radius of 5km.</p> <ul style="list-style-type: none"> • <i>Should areas be identified for renewable energy projects?</i> <p>Include renewable energy projects within Neighbourhood Plans</p> <p>Support for community led initiatives, e.g. run of river hydro, should be positive</p> <p>Should be possible for a range of renewable technologies to be well designed and satisfactory in other planning matters</p> <p>Studies we have undertaken and seen published indicate that district heating, ground source heat pumps and photovoltaics have disastrous economic implications and that far more cost-efficient measures, exist</p> <p>Sites for renewable energy projects will come forward far more readily if planning risk was removed by the pre-allocation and favourable planning disposition to particular sites.</p> <p>Promote Queen Charlton Quarry, near Keynsham, as being suitable.</p>
DP2- food production	<p>Supports a policy that safeguards against the loss of allotment land and seeks the provision of new allotments in the Plan.</p> <p>Supports policy that safeguards BMV agricultural land.</p> <p>There should be an exception test where if a proposal would result in the loss of allotment land the proposals must result in their replacement by equally or more accessible and suitable facilities.</p> <p>Valuable for food growing as well as supporting biodiversity, particularly if they are part of ecological networks.</p> <p>Supports the safeguarding of ‘best and most versatile agricultural land’. However, this should be balanced against the need to provide land to meet the needs of the community and to locate development in the optimal sustainable location.</p> <p>Ensuring that there are appropriate opportunities for local food production (whether this is through sufficient size of gardens, or through the provision and protection of allotments and community gardens) is important.(from DP1)</p> <p>Paulton is committed to ensuring that its allotments safeguarded and that more allotments are made available. The current waiting list for allotments is approximately 40 residents</p>
DP3 – sustainable design	<p>Support for policy discussion points. Support for this list of aspirations for sustainable and contextual development</p> <p>The ideas listed would benefit from re-ordering into a more logical framework</p> <p>Policies should not be overly prescriptive that they compromise flair and ingenuity. In taking a less prescriptive approach this is not a reason to use supplementary planning documents to amplify Core Strategy policies – reflective of NPPF para 60.</p> <p>Masterplans and design codes may be appropriate, but only if the site is truly major.</p> <p>Support masterplanning process -enables confirmation of the infrastructure requirements.</p> <p>Curo agrees with the Council’s premise that well-designed places have far reaching benefits and to the reference to Building for Life assessment as a starting point.</p> <p>Curo has two particular comments:</p> <ul style="list-style-type: none"> • as a starting point that any building is ‘functional’; that is fit for the purpose

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	<ul style="list-style-type: none"> • a ‘good mix of uses and tenures’ is often important to making a place economically and socially successful. <p>On occasion, this may have ramifications for varying the proportion, type and mix of affordable housing from that which the established needs would otherwise indicate. It may also be necessary for the Council to limit the extent to which affordable housing is clustered within housing schemes and to ensure its seamless integration, so that schemes are effectively tenure blind.</p> <p>more explicit statement about ‘biodiversity by design’ i.e. green/brown roofs and walls, inclusion of bird and bat boxes etc. so that buildings themselves can support and enhance wildlife within the wider natural environment . Supports the proposal that a key factor in securing sustainable design should be the contribution of natural wildlife features and GI corridors and linkages.</p> <p>bullet change required ‘conserve and where possible enhance the historic assets and landscapes....</p> <p>Add: • Space Standards and • Easy access to public transport.</p> <p>The Canal & River Trust supports some suggestions. Suggest additional point. Whilst the creation of linkages to green infrastructure is important it is equally important that the Green infrastructure asset itself is protected and enhanced, particularly as usage increases. The canal is more than just a transport artery, but also represents a form of open space, performing a variety of functions such as;</p> <ul style="list-style-type: none"> • strategic links between areas; • important wildlife corridors; • a recreation and sport resource; • accessible amenity in urban areas; • access to the countryside; • visual amenity; and • a community resource. <p>Promote walking and cycling by locating developments close to footpaths and cycle ways. Provide fitness trails.</p> <p>External floodlighting, particularly on a large scale and visible from distance, should be guarded against in both the context of the World Heritage Site and in sensitive landscapes.</p> <p>Need reference to the wildlife impacts of lighting in sensitive areas.</p> <p>Benefits of trees within proposals, and woods – see comments for DP1.</p> <p>Development Management Policies should consider water and sewerage infrastructure mass, scale, building form and heights, plot size and materials etc. could be incorporated into a design strategy, and form part of the Design and Access Statement being required for all new developments</p> <p>Public art should be expected only if there is clear evidence of local community support.</p> <p>A Design SPD would be appropriate if further detail is required rather than a detailed Development Plan Policy failure to comply with which could be deemed to be contrary to the Development Plan and therefore unduly onerous.</p> <p>Policy should be sufficiently flexible to permit the Plan to be effective in terms of delivery.</p>

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	<p>CS Policy CP6 in conjunction with NPPF principles provides sufficient guidance.</p> <p>The design points all seem to be rather nebulous and risk creating huge amounts of duplication with other guidance</p> <p>there must be a proportionate approach. ..it is unreasonable to expect a developer to state how he has taken each and every one of these key factors into account.</p>
DP4 - Employment	<p>Why does brownfield before greenfield only apply to employment land? It should be the principle for all development, including housing.</p> <p>National policy on safeguarding employment land (item 1) is set out in the NPPF and policies for attracting inward investment (item 2) are detailed in the Core Strategy. Similarly the six points of national policy are not reflected in item 5.</p> <p>Supports some protection for employment land, given demand for housing. ...Employment sites should be safeguarded against wholesale reallocation to higher value uses such as residential.</p> <p>Need an open and flexible approach to uses on employment land.</p> <p>The Council's evidence base should inform the types of premises and facilities required.</p> <p>Supports focus on high-wage employment opportunities, such as knowledge-driven. Development of the night time economy (see SB6, p18) is exactly the kind of low-wage activity Bath has too much of already; retail similarly.</p> <p>Promoting a knowledge-based economy: the Council could look at what has worked elsewhere (e.g. Paintworks in Bristol).</p> <p>Planning policy should be as flexible as possible so as not to present unnecessary obstacles to potential employment users.</p> <p>Economic development land policies should be as clear, simple and free of red tape as possible in order to encourage inward investment.</p> <p>Provision of live/work units - form part of the Development Brief initially, but more particularly to form part of the evidence based proposals from potential developers.</p> <p>Provision of new, flexible employment space is marginal –been difficult to bring forward employment development in the City.</p> <p>Supporting removal of obstacles, such as flooding or transport constraints should be the Council's highest priority.</p> <p>Employment benefits from clustering and networking so should be directed first at the city and town centres.</p> <p>May be necessary, to cross-subsidise employment with other uses and mixed development.</p> <p>Mixed schemes can generate jobs natural surveillance and other benefits.</p> <p>Should assume the broad definition of 'economic' development set out in the NPPF. Uses outside of the B1, B2 and B8 Use Classes can be classed as economic development and can support economic growth by creating new jobs. Classes B1-B8 uses do not necessarily provide a high employment density.</p> <p>Employment land should be protected from other uses unless it is clearly in an unsustainable location. It is especially important to protect sites which may be grotty (and possibly not popular with nearby residents) but are cheap and suitable for small start-up ventures.</p>

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	<p>Need to deliver sufficient housing in order to support employment development through providing a local workforce.</p> <p>Need to secure the long term operation of critical assets of sewage treatment works, pumping stations and water resources. The review of housing development boundaries may increase development pressures around treatment works and pumping stations where nuisance or amenity values are affected.</p> <p>Any development of the Old Mills site should concentrate on employment uses. Employment opportunities are what Paulton residents need and therefore employment land, such as that identified on the Bovis site must be delivered.</p>
DP5 – employment in rural areas	<p>The policy framework should relate to all types of buildings in rural areas.</p> <p>All types of employment across the “skills base” should be encouraged.</p> <p>Need for a flexible approach towards new uses for existing buildings in rural areas, even if they are in the Green Belt.</p> <p>Do we need to stipulate more than that the development will be in or adjacent to the housing development boundary of a village and be of a scale, character and appearance appropriate to that village?</p> <p>New employment policy should not be overly restrictive in the type of employment permitted in rural areas and a degree of flexibility within locational policies and in the assessment of suitable sites is crucial for the long term sustainability.</p> <p>Criteria based policies for employment proposals in the countryside seem to be a good approach.</p> <p>There should be protection against the loss of existing rural employment uses. There needs to be clear policies relating to dwellings in the countryside as opposed to employment use in the countryside.</p> <p>Further modest development in already developed areas should not be ruled out.</p> <p>Make use of existing buildings where such buildings are suitable and available.</p> <p>Little gain in terms of sustainability in preventing a small isolated employment site being converted to housing if the business that was on the site has happily moved elsewhere</p> <p>Recognise some uses are non-footloose and need to be located in open countryside.</p> <p>The creation of additional boater facilities such as marinas and boat repair yards may not be seen as traditional rural employers but clearly need to be located adjacent to the canal which runs through the rural area.</p> <p>Protect against inappropriate development of rural buildings. Need to be aware of potential for change of use of prominent farm buildings into major industrial units</p> <p>Rural employment and rebalancing urbanisation should be part of a long-term sustainable agenda and fast Internet communications would allow this</p> <p>Renewable energy schemes present opportunities for rural employment and should be encouraged.</p> <p>Re-use of residential uses should continue to be occupied by associated agricultural workers.</p>
DP6 – town	Previous predictions have underestimated the extent e-tailing. Future policy must be based

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centre uses	<p>on a more robust understanding of retail trends.</p> <p>Shopping is in transition at present with the continuing rise of internet and social media shopping. Overly prescriptive 'shopping centre' policies risk becoming dated and the art will be to allow for flexible uses of sustainable, long term developments which can be altered as habits change.</p> <p>High Street retail has the advantage of the physical experience and is likely to retain market share based on the quality of this experience. An informed adjustment of retail frontages may be appropriate</p> <p>There should be greater emphasis on town centres being diverse places where people want to live, visit and work. There will be opportunities to provide more affordable housing in such locations.</p> <p>As the principal urban centre in the district, Bath city centre merits consideration in its own right in this section of the plan.</p> <p>tend to focus on retail development where clearly other uses combine to create vibrant centres that are attractive and competitive. This approach encourages self-containment.</p> <p>In order to enhance the quality of choice of shop types, careful consideration should be given to controlling the number of charity shops, cafes, non retail "shops", (i.e. estate agents etc.) and take-aways.</p> <p>Retain clearly defined shopping areas, but consider including other diverse uses such as residential and restaurant users.</p> <p>Probably a mixture of the two options (on retail protection/frontages) is best - i.e. retain the restrictive policy but maintain as much of the existing retail frontage as possible</p> <p>The existing protection for the primary retail frontage in the centre of Bath stops at the top of Milsom Street has led directly to the over-concentration of licensed premises in George Street. The amenity of local residents has been severely compromised. Policy needs to be relaxed, so that these bars, etc., are dotted around the city not concentrated in one area.</p> <p>Support for the principle of retaining protected retail frontage but would advocate reducing the number of areas covered by the protected retail frontage policy as a way of maintaining and preserving the vitality and viability of town centres, helping to concentrate footfall and mitigating the changes of e-tailing in the modern retail arena. This is in line with recent consultations by the Department for Communities and Local Government and help initiate alternative uses for empty retail properties where there is no viable occupier demand.</p> <p>The core retail function of Bath city centre and of the central streets of the smaller towns needs to be protected from fragmentation and from being undermined by large new developments elsewhere.</p> <p>While the boundary of the city/town centre should be defined, it is not necessary to prescribe within them rigidly protected retail frontages.</p> <p>Smaller local centres also need to be defined and protected, because they are crucial to sustainability and community cohesion. Individual shops outside centres may also need to be protected for the sake of residential amenity (on the lines of existing policy S9).</p> <p>Bullet 4: Local centres should be protected, but only where they have a chance of being viable (e.g. Larkhall, Moorland Road, Bear Flat, Weston, Twerton High Street).</p> <p>Planning policy should not discourage the conversion of period properties back to their original residential use. Where historic shop fronts make an important contribution to the</p>

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	<p>streetscape, but retail use is no longer viable, sensitive adaptation to enable residential use while retaining the historic frontage should be encouraged.</p> <p>New retail development should be required to reflect the relevant CA statements and/or the Bath shopfronts guidelines.</p>
DP7 – housing densities	<p>The current policy on minimum densities should continue to be the rule, with any exceptions justified on a case-by-case basis, given the demand for housing.</p> <p>There is no basis on which to continue the current policy of minimum densities which now has no support in national planning policy. Para. 59 of the NPPF states that design policies should guide rather than prescribe density</p> <p>More sophisticated approach towards housing densities is required to reflect the diversity of circumstances - reference to local context and distinctiveness and existing adjacent densities. Appropriate to set broad density parameters, but more important to identify the criteria by which judgments will be made in particular cases.</p> <p>Density that reflects the local area would be better, but only in an area with a very distinct character</p> <p>Certain infill schemes in recent years have looked out of character with their neighbourhoods.</p> <p>Market conditions and need are also relevant to this policy.</p> <p>Wasteful use of housing land should be prevented, but there should not be rigid minimum density requirements.</p> <p>Densities should be defined as part of the design assessment of each site.</p> <p>Recognition of the need for minimum space standards as a vital part of high quality homes - Urges the Council to follow RIBA's call and the lead (and standards) set by London. RIBA (Aug 2013) stated "To ensure new homes provide the types of environment people want to live in, the government should introduce national minimum space and light standards into the Building Regulations for new houses regardless of tenure and location."</p> <p>The plot size of new properties is far too small.</p> <p>Understand that one driver for building on the South Stoke plateau is to accommodate affordable housing at a 30% ratio. This is some 100 houses. If the density of houses to be built on brownfield sites such as Foxhill or in the city centre had the same density as those of Oldfield Park or the Georgian terraces, those 100 houses could be accommodated elsewhere with no need to build on the AONB/greenbelt.</p> <p>Require brownfield land to be developed before greenfield.</p> <p>Housing issues – Some Overarching Principles:</p> <p>Principle 2 reads "Make the most efficient use of land." How does one define "efficiency" in this context? Unless this can be defined it is best omitted.</p> <p>Consideration needs to be given to ways of managing the virtually unlimited demand for market housing including second homes and weekend pieds-a-terre, student HMOs and holiday lets in Bath so that local people in low-paid occupations are not driven out of the city: House building alone will not solve the problem.</p>
DP8 – Specific housing need	<p>Accommodation for specific needs of older people - no elaboration of the wide range of solutions. Recent amendments to Policy CP10 the Core Strategy made it plain that such detail would be encompassed in the Placemaking Plan.</p>

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	<p>Absence of the identification and provision of land required to provide suitable facilities for the aging population (including sheltered housing, age restricted housing, extra care apartments, care homes, dementia care facilities). Evidence of a substantial increase in the population of elderly people within the district - this seems to be a major oversight.</p> <p>B&NES Housing Strategy for Older People 2008-2013 recommended older peoples housing needs should be promoted as a mainstream issue- specific policies needed.</p> <p>There have been a number of planning appeals in relation to whether "extra care" falls within Use Classes C2 or C3. Clarity of this issue should be supported.</p> <p>SJH owns land adjoining its almshouse at Combe Park known as NHS house, which is adjacent to the RUH and SHLAA Site New 3. During the proposed plan period, SJH might like to develop additional accommodation for Older People and therefore we would like to propose the residential C3 allocation for Site New 3 is expanded to include NHS House and the land adjoining it.</p> <p>Small-scale need for starter homes and homes for older people within South Stoke. These might be accommodated within small infilling within the village. The plans for a large-scale retirement development on the South Stoke plateau would threaten these opportunities.</p> <p>Consult extensively with local communities and housing agencies to assess particular needs on a site by site basis.</p> <p>The accent should be on the word "local", and limits put on occupiers from outside the area being allocated accommodation</p> <p>Guidance required on the provision of accommodation for special needs groups and those who choose to live an alternative lifestyle, including gypsies, travelling show people and residential boaters.</p> <p>The requirement for and safeguarding of land and if necessary the allocation of new sites for primary and secondary schools must be incorporated. Specific policy relating to development of new educational establishments is essential.</p> <p>Maybe outside the historic Georgian or Victorian areas, there could be land set aside for self-build and a chance to experiment with timber frame flat pack homes with design support from the local LA.</p> <p>Existing policy HG.12 refers to the need to protect the amenity of neighbours from certain effects of inappropriate sub-division, but it fails to mention the aggravation of insufficient on-street parking. Also no reference to impact on the social and architectural character of the neighbourhood. Have been some regrettable sub divisions of small family houses in areas such as Oldfield Park.</p>
DP9 local community and recreation needs	<p>The Core Strategy does not include any policy to protect the area's community and cultural facilities as recommended in item 70 of the NPPF which states that planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities</p> <p>New developments that have already been proposed in other documents such as the Core Strategy should be related to a particular policy.</p> <p>There is a growing recognition that the rounded experience of a city including its cultural offer and added attractions and profile are, and will increasingly be, essential to attracting trade as well as talent and tourism. Existing cultural infrastructure should therefore always be protected.</p>

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	<p>Provide criteria to encourage further cultural, arts and tourism development in the area.</p> <p>Emphasise social and economic regeneration of existing communities - community facilities are an integral component of thriving neighbourhood and local centres, which in turn can be both a focal point and a catalyst for wider housing regeneration.</p> <p>This approach may lead to more employment opportunities for the local community.</p> <p>For clarity, a description of community, social and cultural facilities should be included in the text, and we suggest this succinct all-inclusive description which would obviate the need to provide examples: community and social facilities provide for the health and wellbeing, spiritual, recreational, leisure and cultural needs of the community.</p> <p>Any policy to protect social facilities should also specifically include pubs. Pubs can be transformed into restaurants or as additional entertainment venues to provide a range of performance spaces, from new plays and dance to live music and comedy which make a vibrant contribution to the evening economy. They also provide historic landmarks being often sited on a prominent corner.</p> <p>Village pubs should be safeguarded and protected as they are vital village assets. Packhorse is closed as a pub. It has some protection as it is listed as an Asset of Community Value</p> <p>Public houses - policies should more generally seek to make market failure a ground for intervention by the planning system and this should cover the most serious cases. Pack Horse at South Stoke will be assisted by the right to bid under the Localism Act.</p> <p>Public houses no longer viable should be allowed to be changed to private residences</p> <p>The facilities of schools and colleges (inc. sports and leisure) should be made available for use by community groups</p> <p>Water based recreation - The previous plan limited development to a few named locations. These locations over time may become unsuitable, or overly congested as has happened. They may no longer be the most appropriate location due to factors such as climate change or numbers of boat movements affecting water resources.</p> <p>Each application should be based on its own merits and therefore overly restrictive policies which suggest locations can prevent possible development in other locations which may become more suitable over time.</p> <p>Promote and safeguard recreational facilities that allow residents and visitors to appreciate the green setting of the city of Bath. National Trust plays a role here with its ownership and management of land at Bath Skyline.</p> <p>Sport and physical activity 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.</p> <p>Concern that there does not appear to be a robust and up to date evidence base for sport and recreation in B&NES although aware one in preparation. NPPF states this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.</p> <p>A planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and should be available for community sport. To achieve this, our objectives are to:</p> <p>PROTECT sports facilities from loss as a result of redevelopment</p>

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	<p>ENHANCE existing facilities through improving their quality, accessibility and management</p> <p>PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.</p> <p>Sport England acknowledges the proposals in the Plan for SB2 Central Riverside and Recreation Ground, SB15 Major Sites (University and Twerton Park) and SK2 Somerdale.</p> <p>Sport England would encourage new development be designed in line with the Active Design principles to secure sustainable design. Active Design has been adopted to describe ways in which master planning can promote healthy environments through creating conditions for participation in sport and physical activity and the use of active travel modes (walking and cycling).</p> <p>All new dwellings in B&NES in the plan period should provide for new , or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a positive impact on health and mental wellbeing</p> <p>Natural England has published information on access to good quality natural greenspace "Nature Nearby; Accessible Natural Greenspace Guidance" that the Council may wish to consider when developing relevant Placemaking plan policies:</p> <p>This guidance describes the amount, quality and level of visitor services that may be required. ANGS standards indicate that everyone, wherever they live, should have accessible natural greenspace:</p> <p>(see reps for standards)</p> <p>Native woodland contributes positively towards delivering improved mental and physical health. Woodland Trust has researched and developed the Woodland Access Standard (WASt) for local authorities to aim for</p> <p>would like to see 'Space for People' (first UK-wide assessment of any form of greenspace) included in policy supporting placemaking in Bath to inform the provision of community woodland.</p> <p>Surveys will define level of requirement for open space and could be used to devise a standard allocation.</p> <p>Outdoor gyms help combat avoidable diseases</p> <p>Bear Flat Association supports the principle to safeguard community and sports facilities that are needed by the community they serve – not only prominent spaces but less formal spaces as community and recreational facilities such as Bloomfield Open Space and the lower playing fields at Beechen Cliff School.</p> <p>Suggest that when open space standards are developed, they should be linked to other aspects of green infrastructure such as ecological corridors so that biodiversity and other targets are delivered in a holistic way.</p>
DP10 – Green Belt development-renewable energy	<p>Needs to be a specific reference to the key role of the Green Belt and the Cotswold AONB in protecting the outstanding universal value of the City of Bath World Heritage Site, forming a buffer zone as required by UNESCO.</p> <p>This policy should also be extended to areas of green space that form the buffer between the housing development boundary and the parish or town boundaries, where such areas are perceived by the local community as being green space even though they may not be formally designated as being Green Belt.</p>

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	<p>There is no point in duplicating what the NPPF says about Green Belt.</p> <p>Greater clarity and site specific policy for Green Belt development would remove the uncertainty.</p> <p>The necessarily generic and high-level approach of national policy is not sufficient to provide a considered and nuanced approach to guiding what development can be accepted in the Green Belt. Seek local clarification and guidance regarding development in the Green Belt.</p> <p>Support for renewables in the Green Belt, as long as they are funded privately.</p> <p>Supports a major increase in renewable energy generation, but each development should be appropriate in its scale and location.</p> <p>Renewable energy proposals should not be supported in the Green Belt unless there are overriding reasons for the development, and the proposed site has been identified within the Neighbourhood Plan.</p> <p>Wind power and anaerobic digestion renewable energy should be permitted in B&NES' Green Belt or they cannot happen in sufficient volume to make a difference.</p> <p>Visual aspects need to be controlled but by far the most efficient wind turbines are the tallest (output is driven by the cube of wind speed), so visual impact is unavoidable and must be accepted.</p> <p>Guidance for development at existing major developed sites in the Green Belt required - should aim to facilitate growth and development of schools</p> <p>Current guidance on acceptable extensions to existing dwellings should be reviewed. The criteria should be qualitative and not rigid percentages or tied to the size of the original dwelling when the green belt was designated. The definition of infilling should be more relaxed, especially in settlements washed over by the green belt designation. Guidance on what constitutes a material intensification or change should be clarified and, where possible, made less stringent.</p>
DP11 – Detailed Green Belt Boundary	<p>The NPPF explicitly states that once established Green Belt boundaries should only be altered in exceptional circumstances</p> <p>Add new land to green belt to compensate for any appropriated for development under this plan.</p> <p>National Trust considers that the Green Belt plays an important role and would be unlikely to support any reduction of the area of designation.</p> <p>BNES 47 provided further evidence (the Green Belt Review Stage 2, the Heritage Asset Study, the Landscape and Visual Assessment and Preliminary Ecological Surveys and Assessment) to inform the Placemaking Plan site selection and allocation process only a matter of a few days before the deadline for representations to the Placemaking Plan.</p> <p>The Inspector has raised concerns regarding the process of assessment that has been undertaken to assess where potential land in the green belt could be released for development. The PMP launch document brings forward the assumptions made in the Core Strategy about Green Belt land release, without the Inspector's concerns being addressed and a final Core Strategy adopted.</p> <p>Core Strategy does not give a “clear indication of how a decision maker should react to a development proposal” (NPPF para 154) .The Council’s planmaking approach will delay the delivery of sites which are critical to the delivery of the Core Strategy</p>

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	<p>Council's approach is that should an unmet need at Bristol be identified, for example as a result of the findings of a future West of England SHMA, then this would be dealt with by way of an early review of the Core Strategy. This would require an almost immediate Green Belt review which runs contrary to the principles of longevity for Green Belt boundaries</p> <p>The options for adjustment of Green Belt boundaries to accommodate growth requirements could, and should, have been subject to more detailed consideration as part of the current consultation to expedite delivery of much needed development.</p> <p>Propose that an assessment of reserve sites should be undertaken now to identify a secondary tier of sites that could come forward at a later stage in the plan period or to meet an undersupply in five year housing land</p> <p>Extensions to rural settlements in the Green Belt have not been considered, and their needs have been ignored by the Core Strategy, even if the settlement is highly sustainable, such as Saltford.</p> <p>Reserve sites need to be considered for both employment and residential development to allow flexibility. Such sites should be selected on sustainable sites on the edges of existing primary urban areas such as Bath, Keynsham and Midsomer Norton.</p> <p>Keynsham would be a logical location for the identification of further reserve sites in the emerging plan. Given the large number of houses that are to be delivered on Brownfield land in Keynsham this is particularly salient. Many of these sites have various constraints arising from the previous usage which means that the potential for one or more of these sites to remain undelivered past the current plan period cannot be discounted and therefore a fall back strategy is essential.</p> <p>Seeks removal from the Green Belt of land between Keynsham and Saltford to deliver immediate and longer term development needs, and enduring separation between the two towns.</p> <p>Land West of Keynsham (adjacent to St Francis Road) is promoted (see reps for justification)</p> <p>Manor Road, Saltford promoted (see reps for justification)</p> <p>No need to amend the Green Belt boundary unless development of overwhelming aesthetic value is proposed, such as the Duchy proposal for a neo-Georgian suburb at Newton St Loe.</p> <p>Reiterate representations made to the Core Strategy for the release of land from Green Belt at Whitchurch Policy RA5 Land at Whitchurch(see reps for justification)</p> <p>Land to the north of Pack Horse Lane, Southstoke, Bath promoted for residential development. Consider it does not perform a true Green Belt function. (see reps for justification)</p> <p>Given that the Green Belt boundary at Odd Down will need to be reviewed consider that the opportunity should now be taken to review the GB boundary at South Stoke</p> <p>No exceptional circumstances to amend the Green Belt boundary in relation to the South Stoke plateau.</p> <p>Hicks Gate site promoted - there should be a clear commitment to reconsider its Green Belt status in early reviews of the Local Plans for Bristol and Bath & North East Somerset.</p> <p>Come House, Lynbrook Lane in Bath request Green Belt boundary alteration (see reps for justification)</p> <p>Orchard House in Bath the Green Belt designation is considered to be an anomaly that should</p>

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	<p>be rectified through the Placemaking Plan. (see reps for justification)</p> <p>F R Daw the owners of Prior Park Garden Centre request amendment to the current Green Belt boundary (see reps for justification)</p> <p>Consider the Kingswood estate in any review of the Green Belt boundaries around Bath. Consideration should be given to removing the School's estate from the Green Belt boundary in its entirety, or alternatively to designate the School sites as 'major existing developed site in the Green Belt' consistent with other schools in Bath. This review is necessary to support the consolidation, development and growth of the main campus in a sensitive and responsible manner.</p> <p>The Foundation has identified the inclusion of Areas 1-6 in any review of land available for potential residential development, and their subsequent removal from the Green Belt.</p> <p>Presses the Council to designate the Paragon School site as a major existing development - the Green Belt poses a considerable restriction upon the operational requirements of the school and its role as a custodian to the listed building. School wishes to undertake limited expansion to improve the education offer on site (for example, new changing rooms and reconfiguration of existing music rooms to meet current educational standards).</p> <p>It is essential that the Council maintain the adopted Local Plan allocation for Prior Park School as a Major Existing Development (MED) Site in the Green Belt, as it is a key designation to allow continued investment in the college to maintain its high standards</p>
DP12 – Previously Developed Sites	<p>Curo supports the adoption of a more flexible approach to developing housing, particularly affordable housing, on previously developed sites in the Green Belt. This should be in addition to the supply of new housing, including affordable housing, on 'rural exception sites'.</p> <p>Tight control on the MEDs is necessary to ensure that the over-arching objectives of the green belt are not lost sight of, notwithstanding the employment/educational importance of sites.</p> <p>Encourage the LPA to make provision to formally identify sites as 'Existing major developed sites in the Green Belt'</p> <p>See Policy DP11 policy comments above re Kingswood Estate, Paragon School and Prior Park College.</p>
DP13 – Green Infra-structure	<p>Strongly supports draft policy that is building on the aspirations of its Green Infrastructure Strategy -</p> <p>needs to be strongly worded so that it delivers the GI strategy's objectives.</p> <p>Supports a strong emphasis on green infrastructure (GI), in particular to conserve and enhance the green setting of Bath and the World Heritage Site.</p> <p>Where is reference made to B&NES' recently approved GI policy?</p> <p>What about reference to the recently approved WHS Setting SPD?</p> <p>Maintain existing Green Belt and extend the protection to other green areas as perceived by communities and do not compromise on this.</p> <p>Agree should be supported by both strategic and neighbourhood maps</p> <p>May be more appropriate for larger scale area based maps to show more detail and highlight areas in need of improvement to quality, provision or linkages.</p> <p>Maps should define areas of Green infrastructure including the South Stoke Plateau which is</p>

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	<p>part of the Cotswold Area of Outstanding Natural Beauty.</p> <p>"I agree about the need to appeal to the European Landscape Convention (DP13)." [NB <i>The PMP states it will develop a more detailed policy following the principles of the ELC -not "appeal" the ELC.</i>]</p> <p>GI designations should be specific and not general, i.e. they should state with precision and clarity (based on relevant evidence) the reasons for any GI designations such as ecological or Play/Recreation value.</p> <p>Green infrastructure policies are often only aspirational. For policies to be effective clear evidence needs to be provided as to their need and the deliverability of the green infrastructure required.</p> <p>Use policies to improve the appearance of urban edges - should not simply fall back to the screening of development through planting and landscaping.</p> <p>Clear policies for each site on what scale and type of green infrastructure contribution are expected.</p> <p>Agree that applications for major development should be required to undertake an audit of existing green infrastructure assets. However it is not enough to look s only at assets within the site but it is also necessary to look at any nearby assets which are likely to be affected by proposals</p> <p>Unlikely that the Kennet & Avon Canal and its towpath or River Avon will be within a site. However residents living in a site near the waterway will use it for recreation purposes and as a sustainable transport route for commuter travel. The additional development is therefore directly impacting on the quality and maintenance of the GI asset</p> <p>Agree that GI should be integral to the design of new developments (and proposals should enhance GI within the site and demonstrate strong links to the wider network</p> <p>Opportunities to link existing GI to surrounding neighbourhoods should be encouraged.</p> <p>Major developments should demonstrate at the planning application stage what their contribution to the green infrastructure network will be.</p> <p>Mitigation/ improvements needed to ensure that GI asset is not degraded. Improved links to GI infrastructure may cause degradation to an asset if the impact of additional usage is not considered and the cost of improvement / additional upkeep borne by the developer.</p> <p>If the requirements placed on applicants were more focussed, decision-makers would be more sympathetic to ecological concerns and the results in terms of protection would be greater</p> <p>Local Green Space designations should be considered. One site that would be particularly suited to such a designation is the Whitewells Public Open Space. This area is a valuable local resource for play and recreation and opportunities for various landscape and biodiversity improvements are likely to exist. This area was (erroneously) omitted from the Open Space designations made within the old Local Plan and this should be rectified by the proposals map going forward.</p> <p>Village Design Statement (VDS) shows the areas making a contribution to the rural setting of Paulton. Note: - the VDS is approved as Supplementary Planning Guidance.</p> <p>If 300 houses are built on the South Stoke plateau, it would irreparably impact the Wansdyke, a significant bat feeding area, the habitat of rare and threatened birds including the skylark.</p>

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	<p>Trees and woodlands are essential components of green infrastructure because of their unique ability to deliver a wide range of benefits for the community, wildlife and the local economy</p> <p>Tree and woodland priorities</p> <ul style="list-style-type: none"> • Review quality and condition of existing woodlands • Identify need and prioritise locations for new woodland and opportunities to link these within and beyond the district • Develop a tree planting plan to define opportunities for street trees and urban woodland • Develop a target for woodland cover • Encourage owners to bring existing trees and woodlands into positive management where appropriate • Protect ancient woodlands, veteran and notable trees • Increase community engagement with and awareness of the benefits of trees, through community planting, ownership and management • Promote the importance of tree planting within private gardens • Explore the role of wood fuel as a renewable energy source and encouraging woodland-based businesses <p>NPPF and England Biodiversity Strategy key aim -expansion of priority habitats</p> <p>The South West Forestry Framework Implementation Plan 2009-2012 (Forestry Commission, 2009, Action 2.3) highlights the need to “Encourage tree planting and woodland establishment”, and this is repeated in Action 3.6 –“Develop spatial framework for targeting tree planting and woodland creation”.</p>
DP14 – locally valued landscapes	<p>Merit in developing an overall GI/landscape protection map or maps which identifies locally important places and views as well as those places benefitting from statutory protection.</p> <p>The Plan should not include any protective landscape designations in addition to those already shown on the Policies Map</p> <p>In terms of identifying local valued landscapes on maps, there may be some benefit in broadly outlining the characteristics or features of undesignated countryside, but there is a danger that - if locally valued areas are annotated on a map - other areas might be considered ‘unvalued’.</p> <p>Consider the updated Natural England National Character Area (NCA) descriptions when developing landscape policy</p> <p>Important local hillsides should be noted in landscape character assessments.</p> <p>To safeguard important views, identify those views on maps and in more general terms, ensure that developers are required to assess the effect of their proposals on such views...policy support for the protection of such views would be appropriate.</p> <p>Encourage an understanding of the ‘spirit of place’ of each locality, or the ‘sense of place’ of each character area.</p> <p>Support for the protection of landscape and topographical features that contribute to local distinctiveness</p> <p>The National Trust would support a more detailed landscape policy to promote the protection, planning and management of all landscapes regardless of whether they enjoy</p>

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	<p>national protection.</p> <p>Bath's landscape setting is protected through the WHS SPD, which must be rigorously applied if the legal obligation to protect the OUV of the WHS is to be met. What about reference to the recently approved WHS Setting SPD?</p> <p>Retain the Local Plan 'village buffers' policy</p> <p>GI assets are often multi-functional. Overly restricted policies aimed at protecting one function may reduce its benefits for other functions. For example the desire to protect habitat needs to be tempered with the desire to improve accessibility and public use.</p> <p>A more detailed landscape policy would not hinder agricultural diversification. Agricultural diversification often involves reuse of redundant farm buildings - this policy is unlikely to hinder such diversification</p> <p>Include landscape character in Development Briefs, and include as part of the information to be submitted for planning consent.</p> <p>If the requirements placed on applicants were more focussed, decision-makers would be more sympathetic to ecological concerns and the results in terms of protection would be greater</p> <p>The South Stoke Plateau should have the same protection as the National Parks.</p>
DP15 – Biodiversity and Natural Environments	<p>Support the enhancing and joining up of areas of biodiversity.</p> <p>Support a policy to protect 'Ecosystem services'.</p> <p>Natural England would advise against subsuming the nature conservation policy framework within that of GI; while nature conservation should be an important consideration of well-planned green infrastructure, a separate policy framework would ensure it is given due regard and appropriate priority depending on locally specific circumstances.</p> <p>Natural England would welcome further policy guidance regarding biodiversity networks, preferably informed by a detailed understanding of existing networks and future priorities and opportunities for enhancement. We would expect the locally specific green infrastructure mapping exercise the Council is undertaking will further inform the application of such a policy.</p> <p>Mapping of components on the Proposals Map could include priority habitats such as species-rich grassland, building on the South West Nature Map and the Avon BAP Atlas</p> <p>Ideally there should be linkages with (where applicable) BAPS, NIAs, LNP, NCAs, NP/AONB Management Plans, ROWIPs, and Green infrastructure strategies.</p> <p>A strong link to the GI Strategy should ensure ecosystem services are taken into account in new development. Council may wish to develop a separate policy that affords particular consideration and protection of ecosystem services re their role in achieving sustainable development.</p> <p>Support landscape-scale protection, enhancement, creation and restoration of habitats - the ecosystem services concept is a tool for furthering this approach.</p> <p>Ecosystem approach provides a framework for building understanding of the services provided by the environment and their interrelationships with the economy and society. It demonstrates the benefits or services we gain from a healthy environment or ecosystem: provisioning clean air, and water; regulating climate control and disease; supporting food,</p>

APPENDIX 2 (Policies)

Policy	Comments / Key Issues
	<p>nutrient cycles, and crop pollination; cultural wellbeing and recreational benefits</p> <p>Critical that the irreplaceable semi-natural habitat of ancient woodland is specifically protected and there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. Would therefore like to see this Placemaking Plan contain a specific Trees & Woods Policy to read: 'Planning permission will be refused for developments resulting in the loss of or adverse effects upon ancient woodland or ancient trees' in accordance with the latest national policy.</p> <p>The Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such trees recognised as historical, cultural and wildlife monuments scheduled under TPOs and highlighted in plans so they are properly valued in planning decision-making.</p> <p>Woodland creation should focus on increasing the area of semi-natural habitats available to wildlife and reducing the negative edge effects of intensive adjacent land use</p> <p>Seek creation of new natural habitats together with a reduction in intensity of agriculture, the development of a succession of future ancient trees through new street tree planting and new wood pasture creation</p> <p>The Living Landscape Grasslands Project has shown that extensive areas of species-rich grassland can be restored by mapping and surveying initial areas, liaising with landowners and working with them to restore and manage their wildlife-rich landscapes, join up fragmented habitats, and so create a robust and sustainable countryside that will help people and wildlife to adapt to climate change.</p> <p>Deliver an increase in wider linked areas of conservation management in the landscape as a whole</p> <p>The policy approach to biodiversity should be positive - encourage solutions through approaches and techniques to mitigate significant harmful effects of development should they arise – which responds to NPPF para 118 bullet 1.</p> <p>The nature conservation policy framework should be simplified and given greater clarity in terms of the local policy priorities for the protection of biodiversity, and how these are to be balanced against other priorities, including the need for development.</p> <p>Biodiversity is very transient and the value of sites can change over short timescales in response to a variety of purposes, including land management and husbandry, sites of importance are more appropriately identified separately from a Proposals Map.</p> <p>Already ample regulatory and legislative frameworks in order to ensure the protection, management and enhancement of biodiversity interests.</p> <p>The emphasis in the NPPF is upon criteria-based policies, rather than restraint designations on a Proposals Map</p> <p>If the requirements placed on applicants were more focussed, decision-makers would be more sympathetic to ecological concerns and the results in terms of protection would be greater</p>
DP16 – Nature Improvement Areas	<p>Consult local established Wildlife groups re Nature Improvement Areas (NIAs).</p> <p>Large scale urban extensions may offer opportunities for enhancement of biodiversity where they are to incorporate green infrastructure</p>

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Policy	Comments / Key Issues
	<p>Local Plan not considered to be the appropriate vehicle for identifying such areas if they are to be identified then it should be through references in the text / policy criteria to broad areas rather than through detailed designations on a Proposals Map.</p> <p>Should be away from the district's recognised settlements</p>
DP17 – historic environment	<p>English Heritage would be pleased to provide more detailed advice in due course to ensure a precise, consistent and effective policy is promoted.</p> <p>Historic environment should be viewed as an opportunity not a constraint</p> <p>Vital that the Council provides adequate resources to maintain the Historic Environment Record; updates into a compliant form, and adopts, a new Bath Conservation Area Character appraisal, and applies sufficient resources to delivery.</p> <p>It is important that the ‘setting’ of heritage assets is not forgotten in the weighing up of the significance of heritage asset against the benefits of a proposal. This should be specifically referred to - particularly in a World Heritage Site context</p> <p>Add to Overarching Principles - Protect the historic environment from the traffic congestion and air pollution that currently disfigures and damages it.</p> <p>Much of the policy on balancing conservation with the benefits of development derives from the NPPF, and the challenge is to make that specific to BaNES where possible.</p> <p>OBJECT to the suggestion that non-designated historic assets be afforded the same protection as designated – by definition the assets are not of equal significance and should not be treated as equal. This violates the principle of protection</p> <p>already ample regulatory and legislative frameworks in order to ensure the protection, management and enhancement of heritage interests The DPD should not replicate or conflict with other such guidance -</p> <p>discussion points set out in the Launch Document relate in the main to matters that are already adequately covered in the NPPF, and therefore do not require local policy guidance care should be taken by B&NES not to deter beneficial development / regeneration from taking place by over emphasis on heritage constraint</p> <p>Substantial, total loss or the demolition of a designated heritage asset(s) is wholly exceptional unless it can be demonstrated the scheme has overwhelming public benefit that outweighs the loss or harm to the heritage asset(s)? - “Do not entirely agree, this is going too far”</p> <p>Reasonable to insist that works to non--designated older sites or properties should be of a good quality and sympathetic to the context, but this should not preclude contemporary changes</p> <p>Applicants should be encouraged as much as possible to provide sufficient information and/or assessment of the historic environment to enable the proper consideration of their proposals</p> <p>Energy</p> <p>Ensure that all the potential least invasive opportunities to improve environmental performance are employed before less sympathetic changes?</p> <p>Supports developments that make a positive contribution to the local identity and character including the sensitive retrofitting of historic buildings for energy efficiency</p> <p>The Council’s publication on retrofitting historic properties does not deal with the cost merits of doing so. In order to balance the risk of devaluing the historic stock, it is essential that the</p>

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Policy	Comments / Key Issues
	<p>cost-of-carbon be assessed and schemes with unacceptably high cost-of-carbon be rejected. The level might be set relative to the current Shadow Price of Carbon set by Government under the CRC</p>
DP18 Promoting Sustainable Travel	<p>Support policy aspirations.</p> <p>Should mention the fact that Bath already suffers from high levels of traffic congestion and air pollution (the latter evidenced by the fact that the entire main road network has been designated as an Air Quality Management Area). The need to reduce associated pollution must be mentioned together with its significance for health and to the law.</p> <p>Not just a question of minimising congestion due to new development, but of addressing existing congestion. Suggested bullet “Reduce existing high levels of traffic congestion”.</p> <p>b. Amend final sentence to read: “These principles will be derived from Bath’s Transport Strategy (being developed separately) and will underpin the sustainable transport policies in this Plan.”</p> <p>Sustainable Transport - Some Overarching Principles:</p> <p>Add to bullet 2: “...while making appropriate provision for residents’ parking.”</p> <p>Clarify. Bullet 3: and 4.</p> <p>Supports initiatives to encourage movement by public transport, bicycle and on foot, and the integration of those non-car forms of travel.</p> <p>Given the recent popularity of cycling, there should perhaps be particular emphasis on providing safe routes and parking facilities for cyclists. Use of former railway land for sustainable transport purposes sounds like a good idea as long as it does not preclude the re-opening of any viable rail routes in future.</p> <p>“Encourage separation of cyclist, pedestrian and vehicle routes.”:</p> <p>Integrating Rights of Way Improvement Plans (ROWIPs) - the public Rights of Way (RoW) network is an integral part of the transport system. It provides a means of sustainable, active travel, particularly for short journeys, in both urban and rural areas and can play a significant part in providing sustainable safer routes for vulnerable travellers.</p> <p>A green infrastructure network of existing and new RoW, quiet lanes and greenways, and other green spaces and corridors provides an essential framework for an effective non-motorised transport network threading through an urban area and into the countryside.</p> <p>Natural England encourages LPAs to involve Local Access Forums, whose role is to advise local authorities on improving public access for open air recreation and enjoyment.</p> <p>More environmentally sustainable forms of access to the natural environment can deliver a range of benefits for people, the environment and the economy.</p> <p>Require new development sites to be linked to existing footways and to be located close to existing or new bus routes.</p> <p>Secure funding through Section 106 payments to support public transport</p> <p>It should be recognised that there are fewer opportunities in rural areas and rural settlements to limit the use of the private car</p> <p>due weight should be given to proposals which seek to balance the delivery of land uses within an area helping to address inequalities and minimising journey lengths</p> <p>In order to deliver the development requirements during the Plan period, it may be necessary to permit developments that create additional loadings on the highway network that are sub-</p>

APPENDIX 2 (Policies)

Policy	Comments / Key Issues
	<p>optimal in highway terms</p> <p>It is unrealistic not to permit any further developments unless and until additional capacity is created, and unreasonable for development to be expected to fund infrastructure improvements to resolve existing problems to which the development itself does not give rise.</p> <p>This is likely to involve permitting development in advance of the implementation of supporting infrastructure in some instances, and the policy framework must incorporate such flexibility</p>
DP19 – key transport infrastructure	<p>Support for policy.</p> <p>Give details of first 3 retained schemes or where this detail can be found in “ Key Transport Infrastructure”</p> <ul style="list-style-type: none"> • Bullet 1- details of these retained schemes must be made available before they are considered for elimination. • Bullet 2 – consider adding <ul style="list-style-type: none"> (a) rail trackbed where Bus Rapid Transit would have been built (i.e. from the east end of the Bristol/Bath cycling track at Brassmill to Station Road), and (b) road widening capability on Lower Bristol Road between Windsor Bridge junction and Twerton Fork. • Add new bullet 3: “The need for the shortest possible A46/A36 link road to remove excess traffic from London Road and Bathwick Street.” <p>Not sufficient evidence to justify the retention of the schemes in the PMP.</p> <p>Infrastructure required should be identified in a new Infrastructure Delivery Plan so that all it can be considered alongside sources of finance</p>
DP20 – traffic management	<p>Employ the principles, and where appropriate, the specific standards, advocated by the Bath Public Realm and Movement Strategy</p> <ul style="list-style-type: none"> • Bullet 1: No traffic management proposals currently exist for the whole of the centre of Bath (i.e. including George Street, Queen Square and Circus). • Bullet 2: wishes to see through traffic discouraged or prevented from passing through Bath city centre (i.e. George Street/Queen Square). Queen Square and The Circus are Key Elements of the World Heritage Site (identified as such in the WHS Management Plan). George Street is a busy shopping/restaurant street which also forms a link (currently a major barrier) between the main shopping centre and the principal Georgian heritage sites. <p>The larger villages such as Paulton and Peasedown should also be included in the Policy framework (bullet 1)</p> <p>Support bullet 2 - Proposed 20 mph limit should be implemented as soon as possible in Paulton, and more traffic calming introduced.</p> <p>Traffic management of other than the city and town centres should be informed by highway data, individual developments must not be expected to bear disproportionate costs of wider benefits than those which accrue to the scheme itself.</p>
DP21 – Park and Ride	<p>A coherent and comprehensive city-wide transport policy for Bath as essential if the Core Strategy's aspirations are to be delivered</p> <p>The P&Rs should operate for much longer, with suitable security for vehicles parked</p>

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Policy	Comments / Key Issues
	<p>overnight. At present the P&Rs are of no use to overnight or late-night visitors.</p> <p>The plan should urgently identify a P&R site to the east of Bath but site identification should not delay the PMP.</p> <p>P&R needs to be demonstrated as a viable solution to reducing the number of vehicles on the roads, not a mechanism for creating more vehicle movements and diversions.</p> <p>Recognise the desirability of identifying a suitable site for a P&R facility to the east of Bath if one can be found without undue landscape harm</p> <p>Important views across the river valleys need to be retained to maintain World Heritage Standards and the AONB status, e.g. Bathampton meadows, Woolley valley, etc.</p> <p>More consultation with residents should be encouraged.</p>
DP22	<p>A parking strategy for the District has been promised, but we are not privy to its contents, because it has not been published (as far as we have been able to ascertain).</p> <p>The future of parking should depend on a robust needs case, giving more weight to the economic implications on business ... this is an area which needs greater background information than has been presented to date for respondents, to give informed comment.</p> <p>All public car parking (excluding Bath) should be free during normal business hours to encourage use of these town centres.</p>
DP23 – Transport, access and development management	<p>Consider the bullets are essential requirements</p> <p>Politicians have failed to grasp the nettle for many years re transport problems: even the opportunity of the JLTP was not taken</p> <p>Waiting for the “Transport Commission” is not enough: action is needed now.</p> <p>Bath carries an "excessive volume" of traffic on "unsuitable roads" in "environmentally sensitive areas". This existing traffic must be dealt with, as well as preventing the introduction of even worse traffic.</p> <p>Highways Agency supports the need for planning applications to be supported by an appropriate transport assessment or transport statement</p> <p>The principle should be laid down that housing development in the Bath area will not be permitted unless the impact on the city of any traffic generated by the development is first at least wholly mitigated.</p> <p>A network of safe, interconnected and extensive cycle routes around the city should be promoted</p> <p>A policy for the shared use of footpaths should be developed and the cycling and walking communities be encouraged to develop mutual usage protocols</p> <p>Cycle paths painted at the edge of carriageways are universally ignored by drivers parking over them (e.g. through Widcombe) and a better solution needs to be implemented.</p> <p>If people feel the need for a car they will park it somewhere else, displacing the problem unless adequate provision is made on site.</p> <p>Improve public transport which may improve choices.</p>
DP24 – parking	<p>Visitor parking in the city centre should be reduced as new P&R capacity becomes available.</p> <p>Provision of new parking in the city centre should be discouraged.</p>

APPENDIX 2 (Policies)

Policy	Comments / Key Issues
standards	For parking standards - the Council should always seek up to date information.
DP25 – Mineral Safeguarding Areas	<p>Coal resources capable of extraction using surface mining methods exist - the central part of the LPA area between Keynsham to the north and Midsomer Norton to the south.</p> <p>The Coal Authority has provided the Council with GIS data illustrating the spatial extent of the surface coal resource, and would expect this area to form part of the defined Minerals Safeguarding Area (MSA) on the Proposals Map.</p> <p>The Coal Authority considers it important that the entire spatial extent of the surface coal resource is safeguarded and that urban/built-up areas are not excluded from the MSA, as opportunities for prior extraction of the resource before commencement of non-mineral development would be lost. Where mining legacy poses a potential risk to land stability, prior extraction can also prove to be a more viable method of site stabilisation than grout filling of shallow voids.</p> <p>The Coal Authority would recommend that the Council utilises the methodology for defining MSAs as set out in the BGS/Coal Authority publication "Mineral Safeguarding in England: Good Practice Advice" (2011).</p> <p>Reason – In order to ensure that surface coal resources are not unnecessarily sterilised by non-mineral development, in line with the requirements of paragraphs 143 and 144 of the NPPF.</p>
DP26 – Mineral Allocations	<p>Agree that Upper Lawn Quarry and Stoke Hill Mine should continue to be allocated for mineral extraction</p> <p>A criteria based policy to deal with any future mineral proposals would appear sensible.</p> <p>Consider policy guidance for the restoration of quarries once minerals activities cease, to ensure opportunities for environmental and other enhancements.</p>
DP27 – Aggregate Recycling Areas	<p>This section implies that the use of the Former Fullers Earth Works site for aggregate recycling and related activities is permitted activity. Some of the activities are currently subject to high court and enforcement proceedings. Need for legal advice on wording.</p> <p>Support the continued extraction of Bath Stone at the Limpley Stoke Mine. This is an essential local material for the maintenance of the heritage of the World Heritage Site.</p>
DP29 – Energy Minerals	<p>Agrees that a precautionary approach should be applied to all proposals for shale gas exploration and extraction within the Plan area.</p> <p>Lobby central Government to apply this policy in neighbouring Authorities where there could be an impact on the Hot Springs.</p> <p>Examine every proposal for shale gas exploration and extraction to ensure that such proposals have zero impact on communities and the environment in general.</p> <p>There needs to be provision to take a very cautious approach to fracking, as the EIA provision seems to be an ineffective way of safeguarding the future water supply</p> <p>Protection of the Bath Hot Springs is of paramount importance. This should also apply equally to springs that are currently, or could possibly be used in the future to provide drinking water.</p> <p>Citing the Bath Hot Springs as a precautionary reason to resist shale gas exploration is too onerous. A reasonable, independent and professional assessment of the risk should suffice.</p> <p>Should it be clearly and convincingly demonstrated that the hot water springs can be assured,</p>

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Policy	Comments / Key Issues
	<p>any such policy would, I presume, be reconsidered?</p> <p>The Coal Authority would support the inclusion of a locally distinctive policy addressing new energy technologies, such as Coal Bed Methane (CBM), Abandoned Mine Methane (AMM), and Underground Coal Gasification (UCG).</p> <p>The Council needs to be careful that it does not confuse CBM extraction with “fracking” for shale gas. Whilst CBM involves the drilling of a deep borehole into coal seams, the methods employed for CBM extraction are not the same as fracking for shale gas. The concerns set out in DP29 regarding the impact of fracking on the Bath Hot Springs should not therefore automatically be applied to CBM.</p> <p>Reason – To ensure that the Placemaking Plan does not confuse CBM with fracking for shale gas.</p>
DP30 – Pollution, health and safety	<p>As previously identified, there is a legacy of past coal mining activity within B&NES, which poses a potential risk to the stability of new development. These coal mining legacy hazards, which include approximately 567 recorded mine entries, are broadly located in the central part of the LPA area, reflecting the presence of surface coal resources across this area.</p> <p>The Coal Authority therefore considers it important that this locally distinctive issue of mining legacy is highlighted and that an appropriate policy is included in the Placemaking Plan regarding the need for developers to afford due consideration to unstable land as part of their proposals.</p> <p>Reason – In order to ensure that the locally distinctive issue of unstable land and mining legacy is afforded due consideration in the Placemaking Plan, in line with the requirements of paragraphs 109, 120, 121 and 166 of the NPPF</p> <p>Add new bullet 5: “As road transport is the biggest source of air pollution, introduce a Transport Strategy for Bath which reduces this to safe and legal levels.”</p> <p>EA satisfied with the different topic areas listed as needing review.</p> <p>Strongly support a review of the policies to ensure their wording is updated to take into account latest best practice and guidance</p> <p>Wessex Water In view of the recent withdrawal of planning guidance and replacement with NPPF has drafted policies for local planning authorities to consider (see reps for policy text under following headings)</p> <ol style="list-style-type: none"> 1. Proximity Consultation Zones 2. Utility Infrastructure Policy 3. Wastewater Infrastructure Policy 4. Water Resources Policy <p>Encourage (ground) investigations into development sites, notably those within settlement boundaries that might otherwise be ignored or not pursued with commitment.</p>
DP31 – Bath Hot Springs	<p>Support. The Council should lobby central Government to apply this policy in neighbouring Authorities where there could be an impact on the Hot Springs. The Hot Springs are the first mentioned item in the Outstanding Universal Values of the City of Bath World Heritage Site</p> <p>All developers must be made fully aware of the implications of the County of Avon Act 1982. (reference to the ‘Avon Act 1983’ in the document is incorrect)</p> <p>Reference to need to apply the ‘precautionary principle’ to future shale gas exploration and</p>

APPENDIX 2 (Policies)

Policy	Comments / Key Issues
	<p>extraction.</p>
DP32 – Other Issues	<p>Other Issues and Policies: This section implies that only selected existing Local Plan policies will be saved. Surely the principle should be that they are all saved unless there is a case for modifying or deleting them? For example, none of the points on this list will protect residents from the impact of new licensed premises in their area (and yet there must be a policy for this, retained or established anew).</p> <p>Advocate a policy to deal with development affecting the canal/river corridor – it is an important asset and there are several key development areas adjacent to the river. This policy could recognise the multi-functional nature of the waterspace and bankside area and cover moorings and boating facilities as well as the interaction between development and the waterspace. Development control checklist of issues to be considered at Rep Appendix 2.</p> <p>Soil is a finite resource and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably. The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process.</p> <p>Plan policies could refer to the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.</p> <p>Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered as part of ecological connectivity.</p> <p>Best and most versatile land: potentially difficult choices in order to secure the most sustainable outcomes. Consider Natural England's: Agricultural Land Classification: protecting the best and most versatile agricultural land (TIN049).</p> <p>Ensure that the value of BMV land as a resource, part of our “natural capital”, with many potential uses (including recreation, biomass, forestry, biodiversity and leisure uses) and as a provider of ecosystem services, is not overlooked. This helps underpin the principles of sustainable farming together with soil protection and the adoption of an “ecosystem services approach.”</p> <p>Land ownership issues on potential development sites need to be addressed and resolved.</p> <p>Mobile Operators Association suggests a clear and flexible telecommunications policy - short paragraph outlining the development pressures and the authority's policy aims.... background information should be contained within a separate non-statutory LDD which would not need to go through the same consultation process. Suggested text for the policy included in rep.</p> <p>Advice on the siting and design of telecommunications and good practice procedural guidance is contained within the Code of Best Practice for Mobile Phone Network Development (July 2013). Builds on Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process.</p> <p>It would be helpful for the PMP to explain more fully and justify the inclusion of the development sites. There is little by way of explanation as to why they have been selected. Other opportunity sites coming out of this consultation event should be considered and reviewed.</p>

Text for mailout for Placemaking Plan Options Document

INVITATION TO COMMENT ON THE PLACEMAKING PLAN OPTIONS

Now is your chance to comment on the options for key development sites and the planning policy framework in Bath and North East Somerset. When adopted, the Placemaking Plan, together with the Core Strategy, will help shape what development takes place and where and will be used for determining planning applications in Bath and North East Somerset up to 2029.

Sent on
26 Nov
2014

About the Placemaking Plan

The purpose of the Placemaking Plan will be to:

- allocate and facilitate the delivery of sites for housing, employment and other uses to help meet development needs identified in the adopted Core Strategy
- review and update the development management policies used in the determination of planning applications
- safeguard and enhance the quality of places in Bath and North East Somerset including the protection of local green space, wildlife and historic buildings
- provide the opportunity to work together with local communities to update Housing Development Boundaries.

The Placemaking Plan was launched last year when people had the opportunity to comment on the issues to be addressed in the Plan. We are now at the Options stage.

About this consultation – Options stage

The Options stage is a stepping stone to the preparation of the Draft Plan in 2015. In preparing the Plan the Council is required to test and consult on reasonable alternatives. The options document does not set out Council policy, rather it outlines the Council's view of the reasonable alternatives or 'options' for site allocations and development management policies.

This consultation is your chance to comment on these options which will help inform the draft Plan. Beyond this consultation period there will also be the opportunity for communities and other stakeholders to continue working with the Council in preparing the Draft Plan.

Please note that this consultation does not relate to the urban extension sites at Bath and Keynsham, as these were allocated in the Core Strategy and are subject to a separate master planning process which will involve local communities.

Consultation Details

The 'Placemaking Plan Options document is published for **comment between 27th November 2014 and 30th January 2015**. Please note that all comments will be made publicly available.

All consultation documents, comments form and background evidence are available on the Council's Placemaking Plan webpage www.bathnes.gov.uk/placemakingplan.

The Placemaking Plan can also be viewed at the following locations during opening hours:

APPENDIX 3

- Council offices
 - The One Stop Shop, Manvers Street, Bath, BA1 1JG
 - The Hollies, Midsomer Norton, Bath, BA3 2DP
 - Civic Centre One Stop Shop, Temple Street, Keynsham, Bristol, BS31 1LA
- At all public libraries in the District, including the mobile libraries
- At the drop-in sessions (details below)

The Plan preparation is informed by Sustainability Appraisal (SA). The SA of the Options document will be published in mid-December 2014 and made available on the Placemaking Plan webpage www.bathnes.gov.uk/placemakingplan.

How to make comments

You are strongly encouraged to make your comments on-line via the Placemaking Plan webpage (details above). Alternatively you can:

- complete the comments form and send it by email to placemakingplan@bathnes.gov.uk.
- send your completed form or comments in a letter to Planning Policy, Bath & North East Somerset Council, PO Box 5006, Bath BA1 1JG.

Please ensure your comments reach us no later than 5pm on **Friday, 30th January 2015**.

Drop-in events

We will be holding drop-in events throughout the District at the venues shown below, which members of the public are welcome to attend and discuss issues with officers.

Date	Time	Venue
28.11.14	4 – 8 p.m.	Midsomer Norton, Town Hall
04.12.14	4 – 8 p.m.	Radstock, Methodist Church Hall
08.12.14	4 – 8 p.m.	Keynsham, One Stop Shop
10.12.14	4 – 8 p.m.	Chew Magna, Millennium Hall
07.01.15	4 – 8 p.m.	Bathampton, Village Hall (small room)
08.01.15	4 – 8 p.m.	Bath, Central Library
12.01.15	4 – 8 p.m.	Temple Cloud, Village Hall
13.01.15	4 – 8 p.m.	Bath, Central Library
15.01.15	4 – 8 p.m.	Westfield, Radstock College

Should you have any queries, please do not hesitate to get in contact.



Lisa Bartlett
Divisional Director - Development

TEXT FOR MAILOUT - PARISH/TOWN COUNCILS

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The Council has been working closely with the Parish and Town Councils since the Placemaking Plan was launched and much of this work is reflected in the Options document. This consultation is your chance to comment on all the emerging Options. Comments received will help inform the draft Plan. Beyond this consultation there will also be the opportunity for communities and other stakeholders to continue working with the Council in preparing the Draft Plan.

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- At the drop-in sessions (details below)

We are encouraging using the document on-line. However, if you would like a black and white copy of the Options document, please contact us.

The Plan preparation is informed by Sustainability Appraisal (SA). The SA of the Options document will be published in mid-December 2014 and made available on the Placemaking Plan webpage www.bathnes.gov.uk/placemakingplan.

How to make comments

- You are strongly encouraged to make your comments on-line via the Placemaking Plan webpage (details above). Alternatively you can:
- complete a comments form and send it by email to placemakingplan@bathnes.gov.uk.
- send your completed form or comments in a letter to Planning Policy, Bath & North East Somerset Council, PO Box 5006, Bath BA1 1JG.

Please ensure your comments reach us no later than 5pm on **Friday, 30th January 2015**.

Drop-in events

We will be holding a series of drop-in events throughout the District at the venues listed below, which members of the public are welcome to attend to find out more about the emerging Placemaking Plan options and to submit comments.

Date	Time	Venue
28.11.14	4 – 8 p.m.	Midsomer Norton, Town Hall
04.12.14	4 – 8 p.m.	Radstock, Methodist Church Hall
08.12.14	4 – 8 p.m.	Keynsham, One Stop Shop
10.12.14	4 – 8 p.m.	Chew Magna, Millennium Hall
07.01.15	4 – 8 p.m.	Bathampton, Village Hall (small room)
08.01.15	4 – 8 p.m.	Bath, Central Library
12.01.15	4 – 8 p.m.	Temple Cloud, Village Hall
13.01.15	4 – 8 p.m.	Bath, Central Library
15.01.15	4 – 8 p.m.	Westfield, Radstock College

In addition the Council can prepare an **Action Pack** designed for use by Parish or Town Councils should they wish to hold their own Placemaking Plan consultation events. This will include a set of consultation documents, comments forms, a supply of posters and postcards to disseminate in the locality to advertise the Council-led

APPENDIX 3

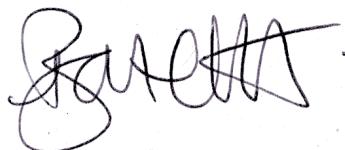
drop-in sessions plus display material relevant to the locality. Please get in contact as soon as possible if you would like to be supplied with an Action Pack.

Posters

In view of the importance of reaching as many people as possible in your parish, we would be extremely grateful if you could display posters advertising this consultation in your area. These are available via this link www.bathnes.gov.uk/placemakingplan. We can supply you with additional posters on request.

In the meantime, should you have any queries, please do not hesitate to get in contact.

«Consultee_Closing»



Lisa Bartlett
Divisional Director - Development

Press Release

Chance To Comment On Council's Placemaking Plan

Press Release

Friday 28th November, 2014 - 09:01 | Posted by NOW Bath News Team 0

The Council is offering local residents the opportunity to comment on their draft Placemaking Plan, which looks at options and alternatives for key development sites in the area.



Cllr Tim Ball, the Council's Cabinet Member for Homes and Planning, said: "This is such an important plan for our area and it's important that as many people as possible take a look at it and give us their views."

"Once adopted, the Placemaking Plan, together with the Core Strategy, will help shape what development takes place and where and will be used for determining planning applications in Bath and North East Somerset up to 2029."

The purpose of the Placemaking Plan is to:

Allocate sites for development for housing, employment and other uses to help meet development needs identified in the adopted Core Strategy;

Review and update the policies used in the determination of planning applications;

Facilitate the delivery of key development sites;

Safeguard and enhance the quality of places in Bath and North East Somerset including the protection of valued assets such as wildlife, green space, historic buildings;

Provide an opportunity to work with local communities to update Housing Development Boundaries.

The Placemaking Plan Options document will be published for comment between 27th November and 30th January, 2015.

All consultation documents, comments form and background evidence are available on the Council's website at www.bathnes.gov.uk/placemakingplan.

The Placemaking Plan can also be viewed at the following locations during opening

APPENDIX 3

hours:

Council offices

The One Stop Shop, Manvers Street, Bath, BA1 1JG

The Hollies, Midsomer Norton, Bath, BA3 2DP

Civic Centre One Stop Shop, Temple Street, Keynsham, Bristol, BS31 1LA

At all public libraries in the district, including the mobile libraries.

People are encouraged to make comments on-line via the Placemaking Plan webpage.

Alternatively you can e-mail the comments form to placemakingplan@bathnes.gov.uk or send the form or a letter to Planning Policy, Bath & North East Somerset Council, PO Box 5006, Bath BA1 1JG. If you have any queries about the consultation, you can call 01225 477548.

The Council is holding a series of drop-in events about the plan during December and January:

Midsomer Norton Town Hall

Friday November 28 – 4pm-8pm

Saturday December 6 – 9am – 1pm (display only)

Methodist Church Hall, Radstock

Thursday December 4 – 4 – 8pm

Civic Centre, Keynsham – library

Monday December 8 – 4pm – 8pm

Millennium Hall, Chew Magna

Wednesday December 10 – 4pm – 8pm

Village Hall, Temple Cloud

Monday January 12 – 4-8 pm

Radstock College

Thursday January 15 – 4 – 8pm

Further events in Batheaston or Bathampton and central Bath are also being organised – details will be announced as soon as these are finalised.

Placemaking Plan options consultation

Publicity material Postcards

What type of development do you want in your area? How can we ensure excellence in new development proposals? How can we safeguard our natural and historic assets?

This is your opportunity to influence the emerging vision and design principles for development sites in Bath, Keynsham, the Somer Valley and the Rural Areas. You can also help shape new planning policies.

Find out more and respond online at
www.bathnes.gov.uk/placemakingplan

Bath & North East Somerset Council

A public consultation on the Placemaking Plan options is taking place between 27th November 2014 and 30th January 2015

Overview

The Placemaking Plan will help to deliver better places by facilitating the delivery of high quality, sustainable and well located development supported by the timely provision of necessary infrastructure. It complements the strategic framework in the Core Strategy by setting out detailed development and design principles for identified and allocated development sites, as well as a range of policies for managing development and protecting valued assets across Bath and North East Somerset. The Placemaking Plan will:

- allocate sites for development for housing, employment and other uses to help meet development needs identified in the adopted Core Strategy
- review and update the development management policies used in the determination of planning applications
- facilitate the delivery of key development sites
- safeguard and enhance the quality and diversity of places in Bath and North East Somerset including the protection of valued assets (such as wildlife, green space, historic buildings) and identifying opportunities for change, and

- provide the opportunity to work together with local communities to review Housing Development Boundaries.

The Options document is a stepping stone to the preparation of the Draft Plan in 2015. In preparing the Plan the Council is required to test reasonable alternatives. This document outlines the Council's view of the reasonable alternatives or 'options' for site allocations and development management policies.

This consultation is your chance to comment on the Options and will help inform the draft Plan.

You can make comments and find out more on-line at

www.bathnes.gov.uk/placemakingplan

or call Council Connect
01225 394041

Drop-in sessions

Come to any one of our drop-in sessions to find out more about the options and how to comment. The same material will be available at each session.

- **Venue**
date
4.00pm–8.00pm
- **Venue**
date,
4.00pm–8.00pm

* Confirmed step-free access venues



Placemaking Plan options consultation

What type of development do you want in your area?

How can we ensure excellence in new development proposals?

How can we safeguard our natural and historic assets?

We are notifying you as your property adjoins or is in the immediate vicinity of one of the sites discussed in the Placemaking Plan Options document currently out for public consultation. This document sets out options for this and a number of other potential development sites in your area. Please note these are not planning applications.

This is your opportunity to influence the emerging vision and design principles for development sites in Bath, Keynsham, the Somer Valley and the Rural Areas. You can also help shape new planning policies.

Find out more and respond online at www.bathnes.gov.uk/placemakingplan

Bath & North East Somerset Council

Publicity material Postcards

<Mail-merge name and address>

A public consultation on the Placemaking Plan options is taking place between 27th November 2014 and 30th January 2015

<p>Overview</p> <p>The Placemaking Plan will help to deliver better places by facilitating the delivery of high quality, sustainable and well located development supported by the timely provision of necessary infrastructure. It complements the strategic framework in the Core Strategy by setting out detailed development and design principles for identified and allocated development sites, as well as a range of policies for managing development and protecting valued assets across Bath and North East Somerset.</p> <p>The Options document is a stepping stone to the preparation of the Draft Plan during 2015. This document outlines the Council's view of the reasonable alternatives or 'options' for site allocations and development management policies.</p> <p>This consultation is your chance to comment on the Options. Comments received will help inform the draft Plan.</p>	<p>Drop-in events</p> <p>Come to any one of our staffed drop-in events to find out more about the options and how to comment. The same material will be available at each session.</p> <ul style="list-style-type: none"> • Midsomer Norton Town Hall 6th December 2014 9.00pm–1.00pm (display only) • Methodist Church Hall, Radstock Thursday 4th December 2014 4.00pm–8.00pm • One Stop Shop, Keynsham Monday 8th December 2014 4.00pm–8.00pm • Millennium Hall, Chew Magna Thursday 10th December 2014 4.00pm–8.00pm • Bathampton Village Hall (small room) Wednesday 7th January 2015 4.00pm–8.00pm 	<ul style="list-style-type: none"> • Bath Central Library Thursday 8th January 2015 4.00pm–8.00pm • Village Hall, Temple Cloud Monday, 12th January 2015 4.00pm–8.00pm • Bath Central Library Tuesday, 13th January 2015 4.00pm–8.00pm • Radstock College, Westfield Thursday, 15th January 2015 4.00pm–8.00pm <p>You can make comments and find out more on-line at www.bathnes.gov.uk/placemakingplan or call Council Connect 01225 394041</p>
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Publicity
material
Flyer

Placemaking Plan options consultation

The Council will be holding a series of drop-in events where officers will be available to discuss the Placemaking Plan. The event details are set out below:

Date	Time	Venue
28.11.14	4 – 8 p.m.	Midsomer Norton, Town Hall
04.12.14	4 – 8 p.m.	Radstock, Methodist Church Hall
08.12.14	4 – 8 p.m.	Keynsham, One Stop Shop
10.12.14	4 – 8 p.m.	Chew Magna Millennium Hall
07.01.15	4 – 8 p.m.	Bathampton, Village Hall (small room)
08.01.15	4 – 8 p.m.	Bath, Central Library
12.01.15	4 – 8 p.m.	Temple Cloud, Village Hall
13.01.15	4 – 8 p.m.	Bath, Central Library
15.01.15	4 – 8 p.m.	Westfield, Radstock College

Consultation ends on 30th January 2015

Find out more about the consultation and to respond online at www.bathnes.gov.uk/placemakingplan

**Bath & North East
Somerset Council**

Publicity
material
Flyer

Placemaking Plan options consultation

What type of development do you want in your area?

How can we ensure excellence in new development proposals?

How can we safeguard our natural and historic assets?

This is your opportunity to influence the emerging vision and design principles for development sites in Bath, Keynsham, the Somer Valley and the Rural Areas. You can also help shape new planning policies.

Consultation ends on 30th January 2015

Find out more about the consultation and to respond online at www.bathnes.gov.uk/placemakingplan

Bath & North East
Somerset Council

Publicity material Display Boards

APPENDIX 3

PLACEMAKING PLAN OPTIONS CONSULTATION

ABOUT THE CONSULTATION

This is your chance to comment on the options for development sites and the planning policy framework in Bath and North East Somerset. When adopted, the Placemaking Plan, together with the Core Strategy, will help shape where new development takes place and where and will be used for determining planning applications in Bath and North East Somerset up to 2029.

ABOUT THE PLACEMAKING PLAN

The purpose of the Placemaking Plan will be to:

- allocate and facilitate the delivery of sites for housing, employment and other uses to help deliver the development needs identified in the adopted Core Strategy
- review and update the development management policies used in the determination of planning applications
- safeguard and enhance the quality of places in Bath and North East Somerset including the protection of green open space, wildlife and historic buildings
- provide the opportunity to work together with local communities to update Housing Development Boundaries.

The Placemaking Plan was launched last year when people had the opportunity to comment on the issues to be addressed in the Plan. We are now at the Options stage.

OPTIONS STAGE

The Options stage is a stepping stone to the preparation of the Draft Plan in 2015. In preparing the Plan the Council is required to test and consult on reasonable alternatives.

WHERE TO FIND MORE DETAIL

This display is a summary of the Placemaking Plan Options document.

You can view the complete Placemaking Plan Options document and other background documents on the Council's dedicated Placemaking Plan website www.bathnes.gov.uk/placemakingplan.

The Placemaking Plan Options document can also be viewed at:

- All libraries in the district
- Main Council offices (One Stop Shop, Lewis House, Bath; The Holies Midsomer Norton and Civic Centre One Stop Shop, Keynsham) during opening hours
- Drop-in events

CONSULTATION QUICK GUIDE

HOW TO MAKE COMMENTS

You are strongly encouraged to make your comments on-line via the Placemaking Plan webpage www.bathnes.gov.uk/placemakingplan.

Alternatively you can:

- Complete a comments form and send it by email to placemakingplan@bathnes.gov.uk
- Send your completed form or comments in a letter to Planning Policy, Bath & North East Somerset Council, PO Box 5056, Bath BA1 1QS.

Please make sure that you clearly reference which site or policy you would like to comment on using the reference numbers highlighted in this summary and in the Placemaking Plan Options document.

If you would like help in completing the form, please speak to one of the officers or call us on 01225 477458.

Your comments should reach us no later than 5pm on Friday, 30th January 2015.

DROP-IN EVENTS

As well this one, we will be holding a number drop-in events throughout the district at the venues shown on the enclosed list, which members of the public are welcome to attend and discuss issues with officers.

The event details are set out below:

Date	Time	Venue
28.11.14	4 – 8 p.m.	Midsomer Norton, Town Hall
04.12.14	4 – 8 p.m.	Radstock, Methodist Church Hall
08.12.14	4 – 8 p.m.	Keynsham, One Stop Shop
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12.01.15	4 – 8 p.m.	Temple Cloud, Village Hall
13.01.15	4 – 8 p.m.	Bath, Central Library
15.01.15	4 – 8 p.m.	Westfield, Radstock College

Consultation ends on Friday 30th January 2015

Development Management Policies

CONTEXT

The detailed site proposals must be complemented by up-to-date district-wide policies in order to maintain a high quality environment and to ensure development schemes help to make better places. These need to build on the policy themes set out in the Core Strategy.

The Launch Document started the process of developing other positive and proactive development management policies to help deliver the objectives of the Core Strategy, taking account of national planning policy (NPPF). This is also the chance to review the adopted Plan policies some of which are becoming out of date and to consider if any new policies needed.

Building on comments received through the consultation on the Launch Document and in response to new national planning guidance, the Options document sets out the emerging preferred approach for planning policies. Where reasonable alternative options have been identified for particular policy areas, these have been included. The policy areas covered in the Placemaking Plan are listed below.

Residential Development
Economic Development
Centres and Retailing
Green Belt
Urban Design
Natural Environment
Historic Environment
Meeting local community and recreational needs
Sustainable Transport
Sustainable Construction & Renewable Energy
Sustainable Drainage Systems (SuDS)
Pollution, contamination and safety
Minerals
CIL/Planning Obligations

To find out more about the emerging policy approaches and options and to make comments, please visit our website www.bathnes.gov.uk/placemakingplan

Residential Development

- Supported Housing
- Housing Density
- Houses in Multiple Occupation (HMOs)
- Self-Build
- Retention of Existing Housing
- Boat dwellers



Green Belt

- Previously developed sites
- Visual amenities
- Residential development in villages
- Extensions and replacement buildings



Economic Development

- Office Development
- Industrial Warehousing Uses
- Employment uses in the countryside
- Agricultural development
- Farm diversification
- Essential dwellings for rural workers
- Protection of agricultural land
- Re-use of rural buildings
- Visitor accommodation



Urban Design

- Urban Design Principles
- Local Character & Distinctiveness
- Urban Fabric
- Streets and Spaces
- Building Design
- Amenity
- Infill & backland development
- Lighting



Natural Environment

- Green Infrastructure
- Landscape
- Sites, species and habitats
- Ecosystem Services
- Ecological networks
- Trees and woodland conservation



Historic Environment

- Historic Environment
- Cannington Coal Canal and the Wanlipdyke



Sustainable transport

- Promoting sustainable travel
- Sustainable Transport Routes
- Public Rights of Way
- Transport Infrastructure
- Rail freight facility
- Managing Traffic
- Parks & Ride
- Transport, access and development management
- Parking standards
- Airport and Aerodrome Safeguarding Areas



Minerals

- Mineral Safeguarding Areas
- Minerals Allocations
- Aggregate Recycling Facilities
- Mining and working of minerals
- Energy Minerals



Development Sites - Bath

Bath City Riverside Enterprise Area and Masterplan

What Is This?

The Bath City Riverside Enterprise Area is land designated as a key zone for economic growth by the West of England Local Enterprise Partnership. It has the potential to deliver more than half of the District's job growth during the Plan period and play a key role in providing much needed accommodation for the area's flourishing high-value business sectors.

How does it relate to the Placemaking Plan?

The Masterplan is part of the context for the preparation of the Placemaking Plan and the various pieces of research contained will help to inform the Placemaking Plan. The Masterplan is one means by which the Central Area and River Corridor could be developed. It is however, not a statutory planning document. To be a sound planning document the Placemaking Plan will need to contain the most appropriate development strategy when tested against reasonable alternatives. Therefore, alongside the approach set out in the Masterplan, the Options document sets out two alternative approaches.

Bath & North East Somerset Placemaking Plan Options November 2014

Three overarching spatial strategies (options) governing the allocation of uses for sites within Central Area and elsewhere in the Enterprise Area are presented.

- Option 1 is an indicative interpretation of the Enterprise Area Masterplan. The core strategy is to deliver retail and office space, the delivery of about 50,000 sqm GIA of office space. There is consequently a very limited additional retailing role on these sites. Retail is instead directed to a new 'destination' created within Green Park West and the proposed 'Sydenham Park'. This concept assumes the future re-location of Sainsbury's within Sydenham Park.
- In Option 2 the growth in retailing floorspace (25,000 sqm GIA) is instead focused on the sites that lie closest to the primary shopping area. About two thirds of the office floorspace allocated in Option 1 on the affected sites is redirected to more peripheral areas e.g. Sydenham Park. Sainsbury's remains in situ in Option 2 with major implications for the future role of the immediate area around Green Park Station.
- Option 3 is an intermediary concept delivering a more even split of retail and office across the most central sites. As in Option 2 Sainsbury's remains in situ. Only about 40% of the additional retail floor space is planned. This option also introduces additional sites not considered in 2 and 3. The consultation will determine whether any of the additional sites are realistic allocations or whether further sites should be considered.

Within each option there is a 'base' overall floorspace assumption and in some cases a 15-20% lower capacity. The lower figure is in respect of the base figure e.g. in respect of heritage and associated building height matters. This testing may reveal that the base figure is reasonable or that a lower figure is more appropriate. There may be some sites where further work indicates that a higher capacity is achievable than is currently set out. Evidence a reasonable capacity for each site (in partnership with Historic England et al) will continue up to the publication of the Draft Plan.

Development Sites - Bath

Walcot Street/Cattlemarket Site - SB1

Emerging development and design principles (summary)

- Provide a fine grained, mix of uses that reflect the diverse and varied nature of Walcot Street, containing units of varied size and tenure.
- Repair the broken street frontage of Walcot Street by re-establishing the historic blind line.
- The frontage building onto Walcot Street should be flanked by two streets adjacent to the Commarket building, and the Hilton Hotel.
- Undertake associated public realm works to Walcot Street and within the site in accordance with the Bath Pattern Book.
- Development should not detract from important views over the site and surrounding areas unless required.
- Conserve and retain the whole of the Commarket Building, and provide a public space adjacent to it.
- Embrace the existing function of the vaults as a bat roost, and deliver imaginative and compatible re-use of the vaults.
- Have full regard to the impact of development on important longer distance views of the area.
- Explore opportunities to facilitate the redevelopment or remodelling of the adjacent Hilton hotel site.
- Restore and enhance the biodiversity value of the river and its edge.
- Provide improved pedestrian and visual links to the river.
- Explore the potential of a new pedestrian and cycling bridge over the River Avon
- Explore the best solution for providing car parking.

Central Riverside & Recreation Ground - SB2

Emerging development and design principles (summary)

Riverside West (Parade Gardens, Terrace Walk, Orange Grove, Grand Parade)

- Enable the reuse of current vaults with appropriate city centre uses underneath Grand Parade or Terrace Walk, providing opportunities for better access to the riverside, with enhanced access to and activity in Parade Gardens.
- Improve accessibility to the river edge from Parade Gardens whilst enhancing the view corridor to Putney Bridge and the river itself.
- Connect Terrace Walk to Slippery Lane with low level footway along colonnade.
- Provide connection from Terrace Walk to Parade Gardens, with a potential new building in front of Terrace Walk.
- Maintain open views from Grand Parade, Orange Grove and Terrace Walk to the hillsides.

The River

- The potential removal of the radial gate could improve the ecological function of the river.
- Increase biodiversity along the river edge.
- Lighting at this location needs to be SMART and designed to improved ecological function of river corridor.

Riverside East (The Rec, Bath Rugby Club, Sports and Leisure Centre, Pavilion etc.)

- The green and well treed character of the eastern side of the river corridor should be conserved and enhanced.
- Enhance and intensify and connect leisure offer i.e. individual sports.
- Explore options for car and/or coach parking in this area or on adjacent sites.
- Improve access to rugby stadium.
- Provide opportunity for the leisure centre to be redeveloped.
- Permanent stadium.

Measures should also be introduced that enhance Green infrastructure, including the biodiversity of the river, and provision of habitats for important species.

Mavens Street - SB3

Emerging development and design principles (summary)

- A varied, mixed use economic development area reflecting the diverse and fine grained buildings within of the city centre.
- The urban design/architectural approach should respond to the variety of contexts within the site.
- The design of the development, in particular its roofscape must be sensitive to its prominence when seen from Beechen Cliff and from other surrounding hillsites.
- The building height of South Parade, and its relationship to the wider landscape should strongly influence the position of buildings and their heights.
- Bath stone should be the dominant building material in the area.
- Provide a north-south street aligned to Duke Street and carried through the site to Railway Place.
- Provide an east-west axis to connect the current Royal Mail route from Mavens Street to the riverside.
- Consider a new pedestrian and cyclist bridge to connect this site with the residential community beyond.
- Provide secondary (more intimate) public spaces/streets within the site, particularly on the riverside.
- The design of the streets and spaces should respond to the Bath Pattern Book.
- Enhance Green infrastructure including measures to restore and enhance the biodiversity value of the river and its edge, and a dark corridor for bats.
- Car parking related to development will be limited to disability users only (minimal operational needs).

Bath & North East Somerset Placemaking Plan Options November 2014

APPENDIX 3

Development Sites - Bath



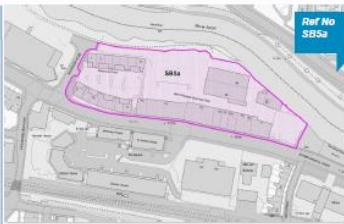
Ref No SB4

North Quays - SB4

Emerging Development and Design Principles (summary)

- Comprise mixed use buildings to also accommodate other city centre uses, particularly on the ground floors to ensure an active frontage.
- Development will generally be fine grained, reflecting the dominant characteristics of the wider city centre, including a mix of tenures and commercial uses.
- The network of streets and spaces in the area should be a natural extension of the city centre. Development must have a positive relationship with the adjacent public realm at ground floor level, especially on key routes through the area.
- The creation of an enhanced riverside environment associated with the implementation of flood conveyance measures will opportunities to enhance biodiversity habitats and connections. Lighting will be a key consideration in relation to bats.
- New footpath connections will be provided over the river to connect an expanded city centre with the South Quays development and to the significant residential communities to the south.
- The design treatment of streets and spaces in the area is to respond to the relevant typology provided in the Bath Pattern Book.
- Development should not detract from important views over the site.
- The design of the development, in particular its roofscape must be sensitive to its prominence when seen from Beechen Cliff and from other surrounding hillsides.
- Architecture should seek to define a confident and contemporary identity for this area responding to the existing varied architectural character of adjacent sites and to the wider context of Bath as a World Heritage Site.
- Solutions for car parking should be explored.
- Coach drop off should be provided as either an interim measure, or as part of the redevelopment of the wider area.

Bath & North East Somerset Placemaking Plan Options November 2014



Ref No SB5a

South Quays and Riverside Court - SB5a

Emerging Development and Design Principles (summary)

Bath Quays South

- A new high quality mixed use scheme comprising a mix of different types of office spaces, with a significant proportion targeted at the creative industries, and other uses including an element of residential uses to enable delivery.
- New and refurbished buildings and associated landscape treatment should create a strong visual and cultural identity to ensure the commercial success of the development.
- The conservation of the historic buildings, public realm and other industrial heritage on the site should be influenced by an appropriate assessment.
- The riverside building on the eastern extremity of the site will present a bold frontage to the river. Further west, development will be required to be set back from the river edge to accommodate the highly visible tree planting.
- Development should not detract from important views over the site.
- The design of the development, in particular its roofscape must be sensitive to its prominence when seen from Beechen Cliff and from other surrounding hillsides.
- A new bridge to be located and orientated to optimise pedestrian and cyclist movement from neighbouring communities to the city centre.
- A publicly accessible pedestrian and cycling route providing safe access through the site, connecting the bridge to the residential communities to the south.
- Materials, design and specification of the public realm must respond to the historic assets, character and context of the site.
- Enhance Green Infrastructure, restore and enhance biodiversity value of the river and the river edge, including a dark corridor for bats.
- Car parking on the site should be limited to operational requirements and should have minimal impact.

Riverside Court

- The potential redevelopment of Riverside Court should comprise a mix of uses, including B1 office development.



Ref No SB5b

South Bank - SB5b

Emerging Development and Design Principles (summary)

- Mixed use, with a significant proportion of employment space. The retention of the existing business spaces should also be sought.
- An analysis of viewpoints is required to enable an appropriate response, and to influence the height, massing and orientation of buildings.
- The design of the development, in particular its roofscape must be sensitive to its prominence when seen from Beechen Cliff and from other surrounding hillsides.
- Measures to restore and enhance the landscape and biodiversity value of the river and the river edge, including a dark corridor for bats are required. A biodiversity study is to be commissioned by developers to inform the development of the site. This should include an assessment of the impact of lighting.
- There should be public access to the riverside.



Development Sites - Bath



Ref No SB19

Green Park Station West

Emerging Development and Design Principles

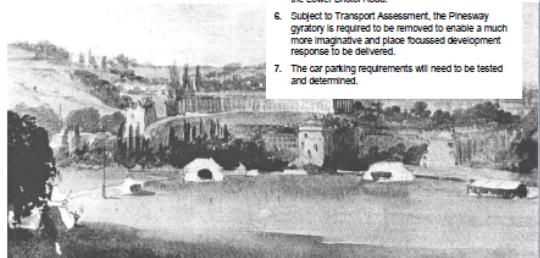
- Responding to strategic viewpoints into and across the site and to the character and sensitivity of valued assets within the World Heritage Site, this area has a significant opportunity to provide a distinct and contrasting built character to the city centre, including different building forms.
- An analysis of viewpoints is required to enable an appropriate response, and to influence the height, massing and orientation of buildings. In accordance with the Building Heights Strategy, the heights of new buildings are to be generally consistent with nearby Georgian buildings.
- Sydenham Park Street will be the central public realm feature of the new development. It is to be a grand gesture, reflecting the architectural presence of Green Park Station, and will be a key green infrastructure corridor that extends the existing avenue of trees at its western end providing a continuous high quality pedestrian and cycle route through to the junction with Brougham Hayes. It will be a pedestrian dominant route requiring development to present an active frontage at ground floor level, but it will also serve as a cycling and public transport corridor, traversing past Green Park Station into the city centre and providing a direct and prominent bus route through the site from the Lower Bristol Road to Green Park Road.
- Streets and spaces must be designed and orientated to provide safe and direct links through the site, to facilitate pedestrian and cyclist movement. The treatment of the public realm should be inspired by the Bath Pattern Book.
- The river corridor should be treated as key component of the area, creating a destination and providing generous public access and activity along the riverbank or at key points along it. The trees along the riverbank should be retained and enhanced to strengthen and reinforce its biodiversity and landscape value, and its role as a vital part of the city's green infrastructure, including its role as a dark corridor for bats. It is a requirement for a biodiversity study to be commissioned to inform the development of the site, and to resolve any potential tension between the design details of public access and habitats for bats.
- There should be strong visual and green infrastructure links through the area, connecting and integrating neighbouring areas beyond, for example between Norfolk Crescent Green and St James's Cemetery.

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Sydenham Park

Emerging Development and Design Principles

- Focused on Sydenham Park Street. This area will need to be designed as a pedestrian dominant environment, facilitating easy and comfortable movement through the area for the new residents of Bath Riverside, and for the larger pool of existing residents in the outlying areas.
- Active uses are expected adjacent to Sydenham Park Street, accompanied by a variety of other uses, typically comprising of residential and B1 employment uses.
- The height and position of new buildings must preserve the view corridor to Green Park Station, which should remain dominant in views and height to new development.
- An analysis of viewpoints is required to enable an appropriate response, and to influence the height, massing and orientation of buildings. The Bath Building Heights Strategy should be used as part of the evidence base for this analysis. This identifies Sydenham Park Street as being within zone 3 of the Valley Floor, and recommends that for new development the overall height should not be less than or exceed the overall prevailing height of nearby Georgian buildings. Note that this is a recommendation for the general height only and is subject to modifiers.
- Development should not detract from important views over the site. An analysis of viewpoints is required to enable an appropriate response, and to influence the height, massing and orientation of buildings. The Bath Building Heights Strategy should be used as part of the evidence base for this analysis. This identifies Sydenham Park Street as being within zone 3 of the Valley Floor, and recommends that for new development the overall height should not be less than or exceed the overall prevailing height of nearby Georgian buildings. Note that this is a recommendation for the general height only and is subject to modifiers.
- Development to the north of Sydenham Park Street must comprise of a finer grained mix of uses, reflecting its proximity to the river corridor, and its residential context. Larger format uses are to be located in the south of the area, where they are able to reinforce the role of the Lower Bristol Road as a key route into the city, and benefit from better transport access. There should be a clearly defined frontage to the Lower Bristol Road.
- Subject to Transport Assessment, the Pinsway gyratory is required to be removed to enable a much more imaginative and place focussed development response to be delivered.
- The car parking requirements will need to be tested and determined.



APPENDIX 3

Development Sites - Bath

The Bath Press - SB7

Emerging development and design principles (summary)

1. The mix of uses comprising employment and residential development, potentially complemented by leisure sector opportunities bulky goods retailing.
2. Retention of the 1920s factory facade and the historically important elements of the building to enhance the Lower Bristol Road and the surrounding area.
3. Development to protect northern views across the site.
4. Developers should not detract from important views over the site and an analysis of viewpoints is required using the Bath Building Heights Strategy to enable an appropriate response, and to influence the height, massing and orientation of buildings.
5. The site lends itself to larger scale building typologies that can offer a different format of business space to more centrally located sites.
6. The built form must create a more engaging and pedestrian friendly response to the key streets surrounding the site, including an active edge to Lower Bristol Road and Brook Road and should help to redefine the identity of the junction of Windsor Bridge Road and Lower Bristol Road.
7. Innovative construction technology and building design to achieve a carbon neutral development creating a new image and identity for the area, and a market for new business space.
8. New streets and spaces through the site must provide improved connections to Oldfield Park Railways Station, Moorland Road District Centre, and Victoria Park for neighbouring residential communities.
9. Improvements to the pedestrian and cycling experience along the Lower Bristol Road are required.
10. The creation of a new green infrastructure link to connect with the green link within phase two of the BWR development is required. This will provide a green corridor from Royal Victoria Park, the river, through Western Riverside, via the Bath Press Site and associated streets, into the Oldfield Park area, and could include the potential for green roofs on some elements of the Bath Press site.

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Roseberry Place - SB8

Emerging development and design principles (summary)

1. Mix of uses to include residential and employment. Other complementary uses such as leisure and retail will be permitted where these do not adversely impact on existing retail centres.
2. Windsor Bridge is a high point allowing long views in all directions towards the hillside slopes of the city and development must maintain visual connections to these hillsides.
3. Development should not detract from important views over the site and an analysis of viewpoints is required using the Bath Building Heights Strategy to enable an appropriate response, and to influence the height, massing and orientation of buildings.
4. Provision of a green infrastructure and cycle link that connects Linear Way 1000 to the cycle route to the safeguarded sustainable transport route (extension of the Bristol/Ban cycle route). There is strong potential to provide new cycling and pedestrian bridges over Windsor Bridge Road and Lower Bristol Road.
5. Enhance green infrastructure and the 'ecological node', taking into account the potential to extend green infrastructure networks, restore and enhance the biodiversity value of the river and the river edge, including the retention of a dark corridor for bats. A biodiversity study is required to inform the development of the site.
6. Create a defined and active edge to Lower Bristol Road and Windsor Bridge Road to enhance this key entrance into the city.
7. Flexible and robust building forms, enabling changes of use over time.
8. Given the context of the site, there is considerable scope for a wider variety of building forms and materials to be used, responding to its mixed use character whilst respecting the homogenous character of the whole city.
9. Facilitate cartageway improvements to the junction, and safeguard/implement the road widening required to enhance highway capacity at this junction.

Former Transport Depot, Brougham Hayes - SB14

Emerging design principles (summary)

The design principles in respect of height, scale and massing have been established through the residential and office planning permission permissions.

Emerging Land Use Options

Option 1

- Allocate this site for wholly residential or residential-led development to enable employment and modest ground floor retailing uses if developer demand was forthcoming. The site is identified in the SHLAA delivery trajectory as a housing site.

Option 2

- An alternative is student accommodation. This is not the favoured use.

Development Sites - Bath

Locksbrook Road and Brassmill Lane - SB11

Emerging development and design principles and land use options

1. Redevelopment opportunities must improve the relationship of the built environment to the riverside, improve pedestrian and cyclist permeability and provide a net increase in business space.
2. Development should not detract from important views over the site. An analysis of viewpoints is required to enable an appropriate response, and to influence the height, massing and orientation of buildings. The Bath Building Heights Strategy should be used as part of the evidence base for this analysis.
3. Measures should be introduced that enhance Green Infrastructure and the 'ecological node', with reference made to the Natural Environment Evidence Base (Ink). Such measure should take into account the potential of extending green infrastructure networks including the enhancement of the river as a green setting and context for the site. This should include measures to restore and enhance the biodiversity value of the river and the river edge, including the retention of a dark corridor for bats. It is requirement for a biodiversity study to be commissioned to inform the development of the site.
4. The existing varied context of the area provides for a range of building typologies that can more flexibly respond to occupier and/or market demand. Provided these buildings respond positively to the public realm, respect important views through and over the sites, and respond to other issues of acknowledged importance, there is scope for greater architectural freedom.
5. The provision of lower cost workspace will be encouraged to support a broader economic offer to the central area.
6. Opportunities to improve accessibility to surrounding communities, in particular connections to local centres (e.g. Twerton and Twerton High Street) must be addressed wherever practicable.
7. Innovative re-use of listed industrial buildings will be supported.
8. Development proposals will be expected to contribute towards the extension of the Bristol Bath Cycle route along the safeguarded sustainable transport route.

Hartwells Garage, Newbridge - SB18

Design principles

Design principles are to be established, will focus on the appropriate response to the split levels within this site. The officer report on the current planning application will be utilised for this purpose once available.

Option 1

1. Allocate the site for wholly residential or residential-led development. The site is identified in the SHLAA delivery trajectory as a housing site.

Option 2

2. An alternative is student accommodation. This is not the favoured use.

Twerton Park - SB15

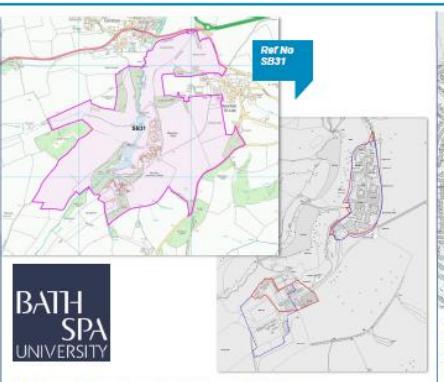
Emerging development and design principles and land use options

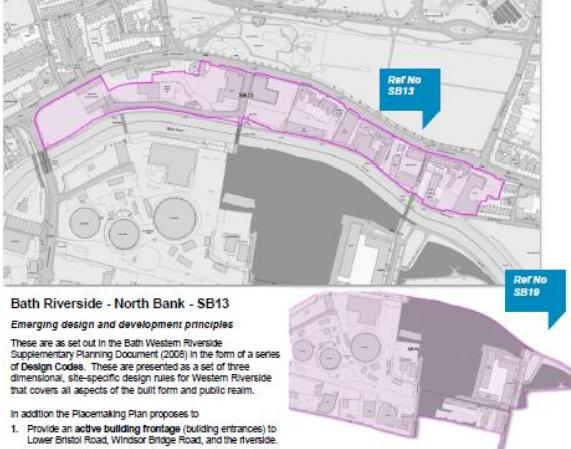
Regardless of whether the club stays relocates or not, any significant development at Twerton Park should seek to enhance the Twerton High Street area as a local centre, where possible, by enhancing local retail or commercial leisure provision. There is also significant scope for the associated residential redevelopment of the site.

- Views through site, pedestrian routes through site and building heights will be key design parameters requiring guidance in the draft Plan.
- The retail evidence base identifies a small additional need for additional convenience food shopping from 2020. Does this site to provide an opportunity for meeting that need, given that it is one of the few developable sites adjoin a local centre?

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APPENDIX 3

Development Sites - Bath		
 <p>University of Bath at Claverton Down 2011 - 2026 - SB26</p> <p>Emerging policy approach</p> <p>1. A comprehensive scheme expressed within a university-wide development framework for the estate, adopted at each iteration by the development control committee for development management purposes,</p> <ul style="list-style-type: none"> a) approx. 43,250 sqm GIA (gross internal area) or 60,000 sqm GIA of additional university-related non-residential development for uses including learning, research and allied business incubation and knowledge transfer; conference; university administration and IT; and sports, health, creative arts, social, recreational and catering purposes b) approx. 58,000 sqm GIA (2,000 bedrooms) or 70,000 m² GIA (2,400 bedrooms) of additional student residential accommodation. c) the lands, assets and resources management of the campus that the University identifies as a central consideration area, within a broadly east-west infrastructure corridor, and other visually and ecologically important planted areas and landscape screens. d) adequate and suitable replacement on or off-site of any displaced existing sports pitches. e) On and off-site transport infrastructure necessary to deliver an integrated transport solution, including decking part of the west car park f) High quality design and landscaping that responds positively and sensitively to the Cotswolds AONB designation and ensures that development on the campus has much-improved visual and landscape relationship with neighbouring land, particularly Bushey Norwood. g) Phasing criterion to be established relating to the delivery of on-campus bedrooms to the approval of academic space. <p></p>	 <p>BATH SPA UNIVERSITY</p> <p>Bath Spa University Newton Park Campus - SB31</p> <p>Emerging policy approach</p> <p>1. Development at the Newton Park Campus should be made within the provisions of paragraph 69 of the National Planning Policy Framework and the developed area at the campus within which paragraph 69 applies is defined on the Policies Map and reflects the implementation of phases 1 and 2 of the University's master plan to 2030.</p> <p>2. Development beyond this area will require very special circumstances to be demonstrated. These should be presented with the context of a Strategic Framework for the University's entire estate and should show that there is no reasonable and deliverable alternative outside the Green Belt, as well as assessing the degree of harm that would be caused to the Green Belt.</p> <p>3. In all circumstances regard should be had to the optimum arrangement of development within the Green Belt and the protection and enhancement of the significance of heritage assets, including Newton Park Historic Park & Garden. Any rearrangement of uses, utilising land in the Green Belt, that would have a significant positive effect on the significance of heritage assets may from part of a very special circumstance case of itself.</p>	 <p>Royal United Hospital - SB28</p> <p>Emerging policy approach</p> <p>1. At this stage the principle of policy criteria relating to parking and alternative uses is being considered as an option. The detailed wording of such criteria requires further consideration.</p> <p>2. The development of the RUH should maintain a suitable level of parking provision, by retaining the existing level and increasing it where development will increase patient numbers.</p> <p>3. Proposals for non-healthcare uses on former RUH land should provide evidence that the land will not be required for healthcare provision or parking during the Plan period.</p> <p></p> <p>Royal United Hospital Bath NHS Trust</p>
Bath & North East Somerset Placemaking Plan Options November 2014		

Development Sites - Bath		
 <p>Bath Riverside - North Bank - SB15</p> <p>Emerging design and development principles</p> <p>These are as set out in the Bath Western Riverside Supplementary Planning Document (2008) in the form of a series of Design Codes. These are presented as a set of three dimensional, site-specific design rules for Western Riverside that covers all aspects of the built form and public realm.</p> <p>In addition the Placemaking Plan proposes to:</p> <ol style="list-style-type: none"> 1. Provide an active building frontage (building entrances) to Lower Bristol Road, Windsor Bridge Road, and the riverbank. 2. Create an appropriate townscape relates to the scale of the Lower Bristol Road, rather than seeking to create a 'gateway' buildings. 3. Ensure that development does not detract from important views over the site. An analysis of viewpoints is required to enable an appropriate response, and to influence the height, massing and orientation of buildings. 4. Relative to neighbouring sites should be considered to optimise vehicular access. <p>Bath Riverside – Core Area - SB19</p> <p>Emerging design and development principles</p> <p>These are as set out in the Bath Western Riverside Supplementary Planning Document (2008) in the form of a series of Design Codes. These are presented as a set of three dimensional, site-specific design rules for Western Riverside that covers all aspects of the built form and public realm.</p> <p>Land Use Options</p> <p>Residential-led development, with no additional student accommodation above that already granted planning permission. No other options have been identified.</p>	 <p>Former Ministry of Defence sites at Foxhill, Warminster Road and Ensliegh</p> <p>Outside the river corridor the most significant opportunities for development within the city are the three former Ministry of Defence (MoD) sites. Concept Statements were prepared in September 2012. The Concept Statements outline the planning policy framework for and key requirements in redeveloping the sites primarily for housing led mixed-use development.</p> <p>The Concept Statements are material considerations in the determination of planning applications. They were prepared in advance of disposal of the sites by the MoD. Since that time all three sites have now been sold, planning applications have been submitted in relation to all three sites and part of the Ensliegh site has been granted planning permission for residential development.</p> <p>Core Strategy Policy B3C also identifies land owned by the Royal High School adjoining the Ensliegh MoD site for the development of 120 dwellings during the Plan period. The Core Strategy confirms that the Placemaking Plan will allocate the site comprising the former MoD site to the Royal High School for a comprehensive residential led mixed-use development. The planning requirements relating to land adjoining the MoD site are set out in Policy E3C.</p> <p>It is intended that the three MoD sites will be allocated and for development within the Draft Plan. The development and design principles for the sites will be taken from and closely reflect the Concept Statements. If development of any of the three sites has been substantially implemented before the Draft Plan is prepared and approved by Cabinet they will not be allocated in the Plan.</p>	 <p>Ref No SB18</p>
Bath & North East Somerset Placemaking Plan Options November 2014		

APPENDIX 3

Development Sites - Keynsham

SK2 Somerdale
SK3 Ashton Way Carpark
SK4 Riverside Offices and Fire Station
SK5 Pixash Lane Waste Site

Local Green Space in Keynsham

The Core Strategy sets out the vision for Keynsham, which will continue to act as a market town and service centre for the surrounding area; evolve as a more significant business location and expand to accommodate a growing population. The Core Strategy therefore allocates significant amounts of new development within and surrounding the town.

Many of the key development sites and issues have therefore already been addressed through the Core Strategy. The urban extension sites which provide strategic levels of new homes and new employment space, are allocated for development in the Core Strategy (and subject to a Masterplanning process outside of the Placemaking Plan). In addition the Somerdale redevelopment has planning permission.

However, there is still a need for the Placemaking Plan to identify and allocate some sites for development where no guidance has been provided by the Core Strategy. These proposals at Keynsham to help ensure key elements are delivered. The scale of some of these sites means they will be delivered in the medium to long term. As most of these sites fall within the town centre area, it is important when considering site allocations, to reiterate the key points of Core Strategy Policy KE2, which covers the town centre and Somerdale:

- To establish an integrated and sustainable town centre, which is vibrant and attractive and provides new job opportunities
- Improvement of the management of traffic through the town centre
- Encouragement of larger retail units within town centre
- A town centre District Heating Network
- Reinforcement and enhancement of the Conservation Area strengthening local character
- Improved quality of public realm
- Retention of leisure, sport and recreation functions
- Enhancement of Green Infrastructure
- New high quality mixed use development at Somerdale

Legend

- Site
- Locally Important Green Space
- Bath & North East Somerset Boundary

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Development Sites - Keynsham

Somerdale SK2
Emerging Development and Design Principles
Around 700 dwellings

1. At least 11,000sqm of B1 office use
2. Submission of a Design Guide, to be approved by the Local Planning Authority
3. Retention of Block A and alterations to Blocks B and C
4. New Primary School
5. New GP surgery (D1 use)
6. New social and sports club (Fry Club) and sports pitches
7. New small scale local needs retail (up to 500sqm of A1, A3, A4 and AS uses)
8. Flood protection measures, including provision of SUDS and an area of wetland habitat
9. Provision of landscaping (including retention of avenue of trees along Somerdale Road), wildlife areas, open space and cycle/footways
10. Provision of a multifunctional riverside path
11. Highway works at Somerdale Road/Station Road
12. Remediation of land contamination

Ashton Way Car Park SK3
Emerging Development and Design Principles

1. New leisure centre
2. Retention or replacement of current numbers of car parking spaces
3. Incorporation of a combined heat and power (CHP) plant. The leisure centre should provide the base load for the wider Keynsham Town Centre district heating network and be built to an exemplary low carbon standard in line with Keynsham Civic Centre.
4. Enhancement of the character of Ashton Way. The scale and massing must be compatible with the local built context, and development should reference the fine grain pattern of the former barge plots on site. There must be a variation in roof heights.
5. Incorporate a palette of materials to reflect and complement those of the local vernacular. This must include an element of blue lias stone and provide articulation and relief to the elevations.
6. Green roof to be incorporated into the design of the leisure centre to provide an element of green infrastructure.
7. Improved public realm along Ashton Way, to include tree planting
8. Incorporation of an appropriate landscape scheme taking into account the trees covered by tree preservation orders to the north west of the site
9. Provision of SUDS by using infiltration techniques
10. Incorporation of a new entrance to the High Street. The main entrance to the leisure centre should be opposite the pedestrian footpath linking the High Street to Ashton Way
11. Retention and incorporation of public right of way into the scheme
12. Avoid significant harm to the amenity of residents of the Mayfields
13. Incorporation of public conveniences into the design of the leisure centre
14. Relate highway access to the scouts site to the west

Riverside Offices and Fire Station SK4
Emerging Development and Design Principles (summary)

1. Replacement of existing buildings with a new build mixed use development comprising ground floor retail and/or other town centre uses providing an active frontage to Temple Street, mixed residential and around 2,000sqm of B1 office.
2. Incorporate infrastructure for district heating and be built to a high standard of energy efficiency.
3. High quality design that enhances the Conservation Area and its setting.
4. The scale and massing should provide a more human and lower scale than that of the existing buildings and the adjacent Town Hall. There must be a variation in roof heights.
5. Replacement with a monolithic building will not be acceptable.
6. Incorporate a palette of materials to reflect and complement those of the local vernacular. This must include an element of blue lias stone and provide articulation and relief to the elevations.
7. Continuation of Market Walk into the development site.
8. The southern view from the southern end of the High Street along Market Walk into the site should be enhanced.
9. Provision of suitable car parking, preferably subterranean, that mitigates the transport impact of the development.
10. Improved public realm along Temple Street. The suitability for tree planting should be investigated.
11. Improvement of relationship between the site, Temple Street, the River Chew and the Memorial Park. This should include enhanced pedestrian links between these areas.
12. High quality open space is to be included within the scheme as part of an appropriate landscape scheme.
13. Green roofs to be incorporated into the design to provide green infrastructure.
14. Provision of SUDS (excluding infiltration techniques)
15. A new leisure centre developed as part of policy SK3 should be completed and occupied before the redevelopment of the current leisure centre to ensure continuity of service.

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APPENDIX 3

Development Sites - Keynsham

Pixash Lane Waste Site SK5

Emerging Development and Design Principles

1. Redevelopment for waste purpose and ancillary use
2. Upgrade Worle End Lane to enable HGV access to the Core Strategy employment allocation to the east
3. Site should be considered as part of the Masterplan required for Core Strategy Policy KES3a
4. Suitable landscaped street edge onto Pixash Lane
5. Provision of SUDS by using infiltration techniques
6. Appropriate shape, materials and colour of buildings is required to mitigate landscape impact
7. Minimise visual and acoustic nuisance from the site to the residential properties to the south utilising suitable screening including the use of a landscape buffer
8. Odour Management Plan to be submitted with a planning application
9. Remediation of any land contamination
10. Layout should maximise south facing roofs and incorporate PV panels



Local Green Space in Keynsham

All Town and Parish Councils were requested to assess and identify areas of green space that they want protected from development. It must be demonstrated that these spaces meet the three criteria set out in national planning policy (the NPPF) relating to proximity and importance to the local community and the physical extent of the space.

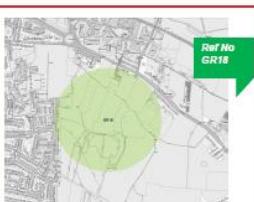
Keynsham Town Council has identified four potential Local Green Spaces as shown on this display.

This consultation also provides the opportunity for local communities in Keynsham to consider whether they wish to promote any other green spaces for designation.

Land west of St John's Court / east of Midward Road GRS



Land east of Breaches Gate GRS



Proposed Local Green Space - Lane / east of Hawthorns Lane GRS



Nature Reserve on the Keynsham Hams GRS



These two areas of green space meet the NPPF criteria for Local Green Space in that they are in close proximity to the town, they serve as special open space within the town, and are local in character. It is therefore proposed to designate these areas as Local Green Space.

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Development Sites - Midsomer Norton and Environs

Midsomer Norton

SSV2	South Road Car Park
SSV1	Central High Street including the Palladium and Brewery sites
SSV4	Welton Bag Factory
SSV3	Midsomer Norton Town Park
SSV10	Former Sewage Works, Welton Hollow
SSV12	Land West of Midsomer Norton Enterprise Park

The Core Strategy provides the strategic planning policy position for Midsomer Norton Town Centre (Policy SSV2). The centre will continue to play the role of the market town serving a wider area, with a priority to unlock key redevelopment sites, in particular to avoid the need for out of centre retail development.

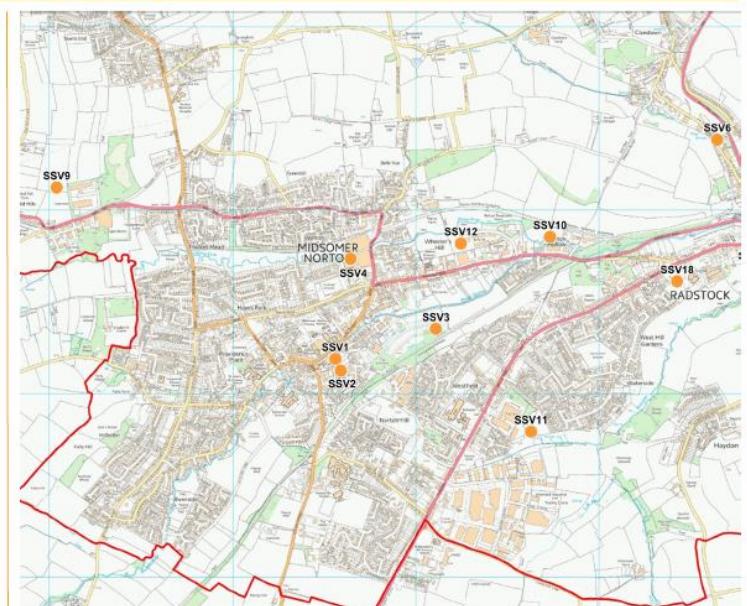
Midsomer Norton Town Council are progressing a Neighbourhood Plan which will become the plan for the town, and be part of the statutory Development Plan upon its adoption (see Town Council display boards).

The Neighbourhood Plan will identify and allocate the key town centre sites for development within the context of enabling delivery of the Core Strategy objectives. These include South Road Car Park and the former Welton Bibby & Baron site.

Westfield and Paulton

The overview map also indicates the location of the following sites in the parishes of Westfield and Paulton:

SSV18	Radstock College
SSV11	St Peter's Factory/Cobblers Way
SSV9	Old Mills Industrial Estate



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APPENDIX 3

Development Sites - Midsomer Norton



Ref No
SSV2

South Road Way Car Park SSV2

The South Road site is currently one of the main long stay car parking areas for the town centre. Its location reinforces the importance of this site in providing accessible public car parking to support town centre activity.

However, this car park site could also be a catalyst for wider regeneration in Midsomer Norton Town centre.

Core Strategy Policy SV2 states that a key principle for the town centre is to enable more intensive use of the South Road car park site, providing an opportunity to accommodate a modern food store. Any development here should retain public car parking for the town centre.

Midsomer Norton Town Council recently commissioned a retail study which identified that a new supermarket of around 45,000 sqft is feasible on the site with parking underneath the store. The BANES retail study currently being undertaken by GVA will also be assessing the credentials of the site to deliver a supermarket.

Regeneration of the site should help stimulate the delivery of new retail and workspace in High Street core and facilitate significant public realm improvements. Key to this is the need to improve the pedestrian link from South Road car park to the High Street.

There are a number of challenges to address in delivery, including how development will:

- relate and connect with the town centre
- continue to offer convenient and accessible public car parking for the town
- will integrate with the topography of the site and neighbouring areas



Ref No
SSV1

Central High Street Core including Palladium and Brewery sites SSV1

Core Strategy Policy SV2 states that a key principle for the town centre is to strengthen the shopping offer in the southern end of the High Street, and provide better pedestrian connections from the main car parks to the core retail area, creating a stronger frontage to South Road.

The retail core in this context is considered to be from the Palladium to the Brewery site. At present the core area is relatively weak and fails to fulfil its potential.

It is dominated by non-retail uses and small units of unattractive character. There are a number of prominent vacant units in a poor state of repair. The poor quality buildings detract from the town centre environment.

The Conservation Area Appraisal recognises the need for restoration of key buildings such as Palladium and former Brewery to bring them into full use and make a positive contribution to the street.

Regeneration of the retail core, either as a whole or in phases, would result in an enhanced offer by providing mixed use retail and office units which have been identified by the Town Council as important requirements for the town centre.

Key aims for these sites:

- Retain the historic features of the Palladium and the Brewery, enhancing the Conservation Area
- Improve the public realm and establish a better balance between traffic and pedestrians to ensure that Midsomer Norton maximises the potential for retail investment and growth



Ref No
SSV4

Welton Bag Factory SSV4

The Welton Bibby & Baron (Welton Bag) factory located on the north eastern edge of the town centre provides a substantial redevelopment opportunity.

The factory buildings and ancillary uses occupy the majority of the 5.7ha site. The 1850s brewery buildings survive largely untouched and with most of their external architectural features intact. These present a considerable asset to incorporate into future development of the site.

The priority will be to deliver an appropriate mix of employment floorspace and housing, and to improve connections through to the High Street.

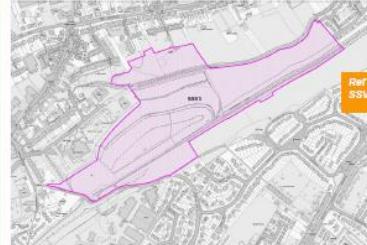
The site is not sequentially preferable to the South Road car park site in terms of new retail offerings, due to it being at the edge of town centre location. The issue of suitable pedestrian links between the High Street and this site also make it difficult for retail uses to function as an integral part of the town centre.

An important focus is the frontage to North Road, where an area of hard standing is divided from the valley top by a high wall. This area presents the only real opportunity to establish a more direct and attractive connection between the site and the High Street via the Stone's Cross gateway.

Incorporation of a high quality green infrastructure link along the Wellow Brook through the site will also be a key priority, linking with the attractive Wellow Green community space.

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Development Sites - Midsomer Norton



Ref No
SSV3

Midsomer Norton Town Park SSV3

This site is predominantly open ground with a number of footpaths. Much of the site is a remnant of the coal mining era, and was a colliery spoil heap.

Planning permission was granted in June 2014 for a new Town Park of around 8.26 ha set to the south of the River Somer. An associated planning application for further land to be designated as a Town Park east of Gullock Tyning and north of the River Somer has also been granted permission.

Including land both to the north and south of the River Somer is crucial because it provides the opportunity to provide linkages between Midsomer Norton and Westfield on a north-south basis.

Inclusion of a pedestrian/cycle bridge will allow people to travel from Radstock Road, through the park to Westfield and encourage cyclists travelling along the existing cycle path to enter the town centre and use its facilities.

The detailed design of the Town Park will evolve over time, but should utilise the landscape to fulfil its potential as an exciting destination for leisure and recreation.

Different areas could be developed for different uses such as green open spaces, steep slopes with trees, paths.

The park will be delivered incrementally over time to an overall masterplan as and when funding streams arise, underpinned by the following key components:

- Ecology should be integral to the design of the park
- The detailed layout of the park should be informed by the trees and their quality on the site
- The detailed design should take into account residential amenity, and lighting should not encourage people to gather in the IT areas during unsociable hours



Ref No
SSV10

Former Sewage Works, Welton Hollow SSV10

The BANES Local Plan allocated the former sewage works at Welton Hollow, Midsomer Norton for employment purposes, and included the site as part of the Core Employment Area. Development has not yet occurred.

The Local Plan required pedestrian and cycle links to the Norton-Radstock Greenway and to Midsomer Enterprise Park access road and/or Radstock Road, and satisfactory access from Midsomer Enterprise Park access road or Radstock Road.

Options for this site

1. Re-allocate the site in the Placemaking Plan for the same purposes and requirements
2. No longer allocate the site but retain it as part of the Core Employment Area
3. No longer allocate the site and remove from the Core Employment Area.



Ref No
SSV12

Land west of Midsomer Norton Enterprise Park SSV12

The BANES Local Plan allocated land west of Midsomer Norton Enterprise Park for employment purposes, and included it as part of the Core Employment Area.

Some development has taken place.

It is proposed to no longer allocate this site but continue to include it within the Core Employment Area to reflect its proposed employment use.



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Development Sites - Westfield and Paulton



Ref No SSV18

Radstock College SSV18

Emerging Development and Design Principles

- Around 50 dwellings Retention of trees fronting A367, western and eastern boundaries
- Building scale and height should not cause intrusion into views from south east
- Reinstatement of public right of way linking Wells Road to Waterside
- Enhance setting of adjacent Conservation Area and Listed Buildings
- To include an area of high quality public open space
- Upgrade of access road from Wells Road to appropriately accommodate new development and which does not negatively impact on access to the College
- Design of new internal roads to be in accordance with the Guidance of Manual for Streets 1 & 2, incorporating shared spaces
- Access for emergency vehicles and refuse collection must be available
- Development must not result in displaced car parking onto adjacent streets
- Provision of SUDS by using infiltration techniques
- Suitable site replacement of recreational land or enhancement of existing off site recreational land to compensate for the loss of the playing fields



Ref No SSV11

St Peter's Factory/Cobblers Way SSV11

Emerging Development and Design Principles (summary)

- Around 30 dwellings (including affordable housing in accordance with Adopted Core Strategy Policy CP9) and employment floorspace
- Vehicular access from Cobblers Way
- Pedestrian and cycle access from Lincoln Road
- In the southern part of the site residential development is to face the open countryside setting of the Waterside Valley, with development keeping well back from plateau edge
- Enhancement of the Waterside stream at southern boundary including restoration and widening of the stream channel, provision of a recreation route along the side of the stream and creating public rights of way, with marshy gradients to be created near the stream for invertebrate interest and an area set aside for wildflower meadow creation
- Retention and strengthening of tree belts and hedgerows around the perimeter of the site as commuting routes for bats, using native species local to the area, filling in gaps where present. Will act as noise barrier and safeguard the residential amenities of housing development to the north east and provide a multi-functional green infrastructure network, incorporating a diverted public footpath CL10
- Provision of native tree species local to the area within the site as part of the landscape strategy for use of bats as part of foraging grounds
- Lighting on site to be LED type using downward defectors and fading towards the development to protect bat commuter routes. Dark contours to be in place to protect bat feeding and commuting routes around the sites perimeter.
- Bat boxes to be erected within the site with provision of suitable monitoring. Refuge for replies to be created and maintained in suitable areas on the edge of and/or adjacent to the site.
- Protection of minor aquifer underlying the site
- Provision of SUDS by using infiltration techniques



Ref No SSV9

Old Mills Industrial Estate SSV9

This site is allocated in the B&NES Local Plan. The main justification for this allocation is to provide a long term supply of new employment land to boost jobs in the area in light of the high levels of out-commuting. This land also provides the opportunity for some of the older factories in less suitable locations to relocate locally instead of leaving the area.

However, the site has not yet come forward for development and the Placemaking Plan provides the opportunity to review the allocation alongside other possible options. The Core Strategy seeks to boost economic growth in the area through inward investment and to encourage inward investment through this to always an argument for more choice and competition on the supply side and this allocation can provide a long term supply of employment development opportunities. The site may also facilitate the relocation of a large employer within the area. The emerging approach below takes forward the Local Plan allocation.

Emerging Development and Design Principles

- Development for business uses within uses E1, E2 & B8 of the Use Classes Order
- Major landscaping to mitigate the impact on the surrounding countryside and nearby residential properties
- Protection, diversion or undergrounding of overhead electricity lines
- Improvements to A362 including its realignment and associated traffic management measures to A362 & Langley's Lane to ensure safe access to the site
- Provision of community facility to meet the needs of workers

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Development Sites and Local Green Space - Rural Areas

COMPTON MARTIN	
SR17 Paddock Sites	
HINTON BLEWETT	
SR8	Land north of Wells Road
SR9	Land south of Wells Road
GR2	Land at West End
GR3	The Glebe
GR4	Land south of Lower Road
EAST HARPTREE	
SR5	Pinkers Farm
SR6	Land between Middle Street & Water Street
SR7	Currells Field
GR1	Parkers Mead
WEST HARPTREE	
SR1	Rosecroft
SR2	Land adjacent to Bristol Road
SR3	Parsonage Farm
SR4	Ridge Crescent
TEMPLE CLOUD	
SR23	Land north of Temple Inn Lane
SR24	Land south of Temple Inn Lane

Context

The Core Strategy seeks to restrain new development in rural areas, although provision is made to meet local needs, such as affordable housing, and to benefit the rural economy. New development is focussed at those settlements which have a range of local facilities and good public transport access. The strict controls relating to development in the Green Belt will continue to apply.

The Core Strategy currently sets out housing expectations in the rural area of around 1,100 dwellings over the Plan period of 2011-2029. To deliver this growth in the rural areas the Core Strategy has a number of policies which will be applied to villages within the District.

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Core Strategy Policy RA1

Villages outside the Green Belt that have at least three key facilities and a daily Monday to Saturday public transport service to main centres will be expected to accommodate around 50 dwellings during the Plan period in addition to small sites within the Housing Development Boundary (HDB). Through the Placemaking Plan sites are being identified, where possible, to accommodate this housing.

Core Strategy Policy RA2

Some limited residential development of around 10-15 dwellings, in addition to small sites within the HDB, will be allowed in those villages not meeting the criteria of Policy RA1 and located outside the Green Belt. Through the Placemaking Plan sites are being identified, where possible, to accommodate this housing.

Villages excluded from the Green Belt

There are a number of larger villages that are 'excluded from the Green Belt' where a Green Belt inset boundary is defined. Housing development can come forward within the HDB at these villages. Opportunities outside the HDB are limited and will be considered in the context of Green Belt policy. There are currently no exceptional circumstances to change the Green Belt boundary to enable housing to come forward. These villages may not be able to deliver the number of dwellings envisaged through Policies RA1 or RA2 and therefore, no such allowance or exception is included in the housing land supply.

Villages "washed over" by the Green Belt

There are also a number of villages in the District that are "washed over" by the Green Belt, which means that restrictive Green Belt policies apply. Under the existing Local Plan only limited infilling, partial or conversion of existing dwellings or subdivision of an existing dwelling is acceptable within the Green Belt as long as it preserves the openness of the HDB, as long as it does not conflict with the purposes of including the settlement in it. It is proposed that the current policy approach is taken forward in the Placemaking Plan and that HDBs will be reviewed (see below). This would continue to provide certainty as to where residential development would be acceptable in Green Belt settlements.

Development sites

The site allocation options and local green space designation options have been informed by the work undertaken by the Parish Councils which has been carefully reviewed and, where necessary, supplemented by the Council.

The Council has sought to put forward deliverable development options that will see the much-needed homes are provided whilst protecting and enhancing the character of the villages.

However, not all of these site options for residential sites identified in the Placemaking Plan Options document will need to be allocated in order to meet the housing numbers required by the Core Strategy for Policy RA1 and RA2 villages.

Reviewing Housing Development Boundaries

The HDBs themselves have not been revised at this stage and remain as they were when the adopted B&NES Local Plan. However, proposed revised boundaries will be included in the Draft Placemaking Plan and the revisions defined on the Policies Map.

Parish and Town Councils have the opportunity to work with B&NES Council on reviewing the HDBs. Landowners and stakeholders also now have the opportunity to suggest or propose revisions to the HDB, justified against the principles as set out in the Placemaking Plan Options document, during the consultation period. These proposals will be considered alongside Parish and Town Councils work.

Local Green Space

All Town and Parish Councils were requested to assess and identify areas of green space that they want protected from development.

It must be demonstrated that these spaces meet the three criteria set out in national planning policy (the NPPF) relating to proximity and importance to the local community and the physical extent of the space.

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APPENDIX 3

Development Sites and Local Green Space - Hinton Blewett

Proposed Local Green Space: The Glebe - GR3

This area of green space meets the NPPF criteria for Local Green Space for the following reasons:

- The site is 0.3ha and is not an extensive tract of land.
- The site contributes to the visual landscape setting of the Conservation Area and the medieval planned village layout.
- The Conservation Area Appraisal states that the character and significance of the built environment is enhanced by and dependent on the site's agricultural landscape setting.
- The site is an important setting to the Grade I Listed St Margaret's Church.
- Traditional meadow land used also for animal grazing supporting flora and fauna.
- Part of the agricultural landscape across the Cam Valley and to the Mendip Hills Area of Outstanding Natural Beauty and beyond.
- Rich meadow land flora.
- Medieval banked boundary hedge to north recorded in B&NES Hedgerow Study 2006

Proposed Local Green Space: Land south of Lower Road - GR4

This area of green space meets the NPPF criteria for Local Green Space for the following reasons:

- The site has been identified as being intrinsically beautiful space and is part of the historic landscape setting.
- The site helps to define the separation and the linear edge of the planned medieval village.
- Part of the agricultural landscape across Cam Valley and to the Mendip Hills Area of Outstanding Natural Beauty and beyond.
- Rich meadow land flora.
- Medieval banked boundary hedge to north recorded in B&NES Hedgerow Study 2006
- Traditional meadow land used also for animal grazing supporting rich flora and fauna.
- The space being immediately adjacent to the existing settlement and Conservation Area it provides a close connection to the countryside.
- The Conservation Area Appraisal states that the character and significance of the built environment is enhanced by and dependent on the site's agricultural landscape setting.

Land north and south of Wells Road - SR9 and SR8

Emerging development and design principles

- 1-2 dwellings on each site.
- Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this location.
- Building materials should reflect the local materials.
- The mature trees and hedgerows on the boundary of the site must be protected.
- Precationary measures should be implemented to avoid disturbance to nesting birds and barn owls if present.
- Provision of measures to enhance the site for biodiversity including native planting; mixed species seeding of lawns and gardens; provision of nest boxes and hedgerow boxes.
- Where illumination is proposed, it should be designed to avoid intruding into areas where darkness is valued as a characteristic feature of the village.
- New development should not intrude upon the skyline.

Proposed Local Green Space: Land at West End - GR2

The site is not suitable for consideration as a Local Green Space Designation for the following reasons:

- The site is not close to the core of the village.
- The site is an extensive piece of land which consists of many fields.
- The site does not fulfil the NPPF criteria as it can demonstrate that it holds particular local significance.

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Development Sites and Local Green Space - East Harptree

Pinkers Farm - SR5

Emerging development and design principles

- Up to 10 dwellings.
- Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this sensitive location.
- Building materials should reflect the local materials which include clay-tiled roofs, a mixture of natural building materials including Carboniferous Limestone and red sandstone.
- New development should not intrude upon the skyline.
- Precationary working practices for the protection of reptiles should be adopted.
- Precationary measures to avoid disturbance to nesting birds and barn owls if present will need to be adopted.
- Provision of measures to enhance the site for biodiversity including native planting; mixed species seeding of lawns and gardens; provision of nest boxes and hedgerow boxes should be included in any site design.
- Where illumination is proposed, it should be designed to avoid intruding into areas where darkness is valued as a characteristic feature of the village.

Land between Middle Street and Water Street - SR6

Emerging development and design principles

- About 10 dwellings.
- Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this sensitive location.
- Building materials should reflect the local materials which include clay-tiled roofs, a mixture of natural building materials including Carboniferous Limestone and red sandstone.
- New development should not intrude upon the skyline.
- Ensure that development would not be harmful to the hedgerows on the boundaries of the site and where possible reinstate the hedgerows.
- Provide a pedestrian link with Middle Road.
- Where illumination is proposed, it should be designed to avoid intruding into areas where darkness is valued as a characteristic feature of the village.

Currells Field - SR7

Emerging development and design principles

- Maximum 5 dwellings.
- Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this sensitive location.
- Building materials should reflect the local materials which include clay-tiled roofs, a mixture of natural building materials including Carboniferous Limestone and red sandstone.
- The length and design of drive required must have the appearance of a rural drive or track to avoid harming the setting of the Conservation Area and Historical Assets.
- New development should not intrude upon the skyline.
- The development must not be harmful to the mature trees on the boundaries or the protected hedgerows on the site.
- Where illumination is proposed, it should be designed to avoid intruding into areas where darkness is valued as a characteristic feature of the village.

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APPENDIX 3

Development Sites and Local Green Space - Rural Areas

BATHEASTON	SR16 Coalpit Garages	Villages excluded from the Green Belt	Revising Housing Development Boundaries
BATHAMPTON	GR16 The Glebe	There are a number of larger villages that are excluded from the Green Belt where a Green Belt inset boundary is defined. Housing development can only be forward within the HDB. Opportunities outside the HDB are limited and will be considered in the context of Green Belt policy. There are currently no exceptional circumstances to change the Green Belt boundary to enable housing to come forward. These villages may not be able to deliver the number of dwellings envisaged through Policies RA1 or RA2 and therefore, such allowance or expectation is included in the housing land supply.	The HDBs themselves have not been revised at this stage and remain as currently defined in the adopted B&NES Local Plan. However, proposed revised boundaries will be included in the Draft Placemaking Plan and the revisions defined on the Policies Map.
Context	GR17 Land south of Lower Road	Villages 'washed over' by the Green Belt	Parish and Town Councils
The Core Strategy seeks to restrain new development in rural areas, although provision is made to meet local needs, such as affordable housing, and to benefit the rural economy. New development is focussed at those settlements which have a range of local facilities and good public transport access. The strict controls relating to development in the Green Belt will continue to apply.		There are also a number of villages in the District that are 'washed over' by the Green Belt, which means that restrictive Green Belt policies apply. Under the existing Local Plan only limited infilling, partial or complete redevelopment of a brownfield site or subdivision of an existing dwelling is acceptable within the HDB, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of protecting the Green Belt in it. It is proposed that the current policy approach is taken forward in the Placemaking Plan and that HDBs will be reviewed (see below). This would continue to provide certainty as to where residential development would be acceptable in Green Belt settlements.	Parish and Town Councils have the opportunity to work with B&NES Council on reviewing the HDBs. Landowners and stakeholders also now have the opportunity to suggest or propose revisions to the HDB, justified against the principles as set out in the Placemaking Plan Options document, during the consultation period. These proposals will be considered alongside Parish and Town Councils work.
Core Strategy Policy RA1		Development sites	Development sites
Villages outside the Green Belt that have at least three key facilities and are within 1km of a main public transport service to main centres will be expected to accommodate around 50 dwellings during the Plan period in addition to small sites within the Housing Development Boundary (HDB). Through the Placemaking Plan sites are being identified, where possible, to accommodate this housing.		The site allocation options and local green space designation options have been informed by the work undertaken by the Parish Councils which has been carefully reviewed and, where necessary, supplemented by the Council.	The Council has sought to put forward deliverable development options that will ensure much-needed homes are provided whilst protecting and enhancing the character of the villages.
Core Strategy Policy RA2		Local Green Space	Local Green Space
Some limited residential development of around 10-15 dwellings, in addition to small sites within the HDB, will be allowed in those villages not meeting the criteria of Policy RA1 and located outside the Green Belt. Through the Placemaking Plan sites are being identified, where possible, to accommodate this housing.		However, not all of these site options for residential sites identified in the Placemaking Plan Options document will need to be allocated in order to meet the housing numbers required by the Core Strategy for Policy RA1 and RA2 villages.	All Town and Parish Councils were requested to assess and identify areas of green space that they want protected from development.
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Development Sites and Local Green Space - Rural Areas

Coalpit Garages, Bathampton - SR16	Proposed Local Green Space: Land at Warmister Road - GR16
Emerging development and design principles	This area of green space meets the NPPF criteria for Local Green Space for the following reasons:
1. 5-10 dwellings. 2. Building materials should reflect the local materials. 3. Open space should be retained on site to ensure there is no harm to the setting of the conservation area. 4. Sensitive design of the housing and gardens will be needed to prevent encroachment on tree canopies and the important wildlife corridor of the Brook. 5. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development. 6. Ensure that development would not be harmful to the mature trees and woodland on the boundaries of the site. 7. Maintain or strengthen the integrity and connectivity of the green infrastructure network. 8. A Sustainable Urban Drainage System (SUDS) must be integrated at an early stage into the design of the site with opportunities taken to maintain or enhance biodiversity. 9. Provide natural surveillance over the adjacent open space. 10. The public right of way (ref. BAZ/34) on the site will need to be safe guarded in any development proposal.	<ul style="list-style-type: none"> The site is located within the Bathampton Housing Development Boundary and is in the heart of the community and close to the village facilities. It lies within the Cotswold Plateau and Valleys Landscape Character Area, the Cotswolds AONB, within the WHS Setting and immediately adjacent to the Bathampton Conservation Area forming part of its landscape setting. From the north, the site forms part of the patches of open hillside extending down into development which is characteristic of the Bath World Heritage Site Setting. The site has been subject of two dismissed appeals where its contribution both to the openness of this part of the settlement and to the setting of the Conservation Area was acknowledged. It was identified in the 1984 Bathampton Designated Conservation Area as one of two designation fringe areas which are of considerable importance to the setting of the Conservation Area. The site is 2.2ha in size and is not considered to be an extensive tract of land.
Proposed Local Green Space: Land adjacent to Miller Walk - GR17	
	This area of green space meets the NPPF criteria for Local Green Space for the following reasons:
	<ul style="list-style-type: none"> The site is located within the Bathampton HDB and is in the heart of the community and close to the village facilities. It lies within the Cotswold Plateau and Valleys Landscape Character Area, the Cotswolds AONB, within the WHS Setting and immediately adjacent to the Bathampton Conservation Area forming an important part of its landscape setting. The site, particularly the northern half appears like a village green within the heart of the village and enhances the row of Listed cottages on the north side of Bathampton Lane. The undeveloped slopes are an important characteristic of Bathampton. This green space was subject to a planning application for housing which was dismissed on the basis that the site makes a contribution both to the openness of this part of the settlement and to the setting of the Conservation Area.
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APPENDIX 3

Development Sites - West Harptree

Rosecroft - SR1

Emerging development and design principles

1. Maximum 15 dwellings.
2. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this sensitive location.
3. The site should be designed to safeguard the amenity of neighbouring residential properties to the south of the site.
4. There are no footways between the site and the village and it is unlikely that a footway could be provided. Bristol Road is a busy road; it would not be acceptable for pedestrians to walk in the existing narrow carriageway during peak times. Therefore an alternative pedestrian and cycle route between the site and the village is required.
5. Ensure that undeveloped parts of the site are given suitable landscape treatment in order to achieve an appropriate relationship with development on site and the wider area.
6. Maintain or strengthen the integrity and connectivity of the green infrastructure network.
7. Development of any kind including gardens and garden boundaries should be kept at least 20m away from the centre line of the eastern and southern boundaries.

Land adjacent to Bristol Road - SR2

Emerging development and design principles

1. Maximum 15 dwellings.
2. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this sensitive location.
3. Ensure that undeveloped parts of the site are given suitable landscape treatment in order to achieve an appropriate relationship with development on site and the wider area.
4. Maintain or strengthen the integrity and connectivity of the green infrastructure network.
5. Development of any kind including gardens and garden boundaries should be kept at least 20m away from the centre line of the eastern and southern boundaries.
6. A Sustainable Urban Drainage System (SUDS) must be integrated at an early stage into the design of the site with opportunities taken to maintain or enhance biodiversity.
7. Any development of this site should include the provision of an access to Lee Croft House which includes parking and turning for commercial vehicles, allowing all vehicles to enter and leave the site in a forward gear.

Ridge Crescent - SR4

Emerging development and design principles

1. Maximum 4 dwellings.
2. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this sensitive location.
3. The site should be designed to safeguard the amenity of neighbouring residential properties to the south of the site.
4. Ensure that undeveloped parts of the site are given suitable landscape treatment in order to achieve an appropriate relationship with development on site and the wider area.
5. Maintain or strengthen the integrity and connectivity of the green infrastructure network.

Parsonage Farm - SR3

Emerging development and design principles

1. Up to 10 dwellings.
2. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this sensitive location.
3. The site should be designed to safeguard the amenity of neighbouring residential properties to the south of the site.
4. Ensure that undeveloped parts of the site are given suitable landscape treatment in order to achieve an appropriate relationship with development on site and the wider area.
5. Maintain or strengthen the integrity and connectivity of the green infrastructure network.

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Development Sites - Temple Cloud and Compton Martin

Land north of Temple Inn Lane - SR23

Emerging development and design principles

1. A housing development of up to 25 dwellings.
2. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this location.
3. Building materials should reflect the local materials and styles.
4. Ensure that undeveloped parts of the site are given suitable landscape treatment in order to achieve an appropriate relationship with development on site and the wider area.
5. Maintain or strengthen the integrity and connectivity of the green infrastructure network.
6. Ensures that development would not be harmful to the hedgerows on the boundaries of the site and where possible reinstate the hedgerows.
7. Any potential development would need to ensure that the setting of the Grade II Listed Temple Inn Public House is not harmed.
8. Retain the public right of way that passes through the site, aiming to integrate this successfully into the development to enable its safe use.

Land south of Temple Inn Lane - SR24

Emerging development and design principles

1. Up to 25 dwellings.
2. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this location.
3. Building materials should reflect the local materials and styles.
4. The site should be designed to safeguard the amenity of neighbouring residential properties around the site.
5. Ensure that undeveloped parts of the site are given suitable landscape treatment in order to achieve an appropriate relationship with development on site and the wider area.
6. Maintain or strengthen the integrity and connectivity of the green infrastructure network.
7. Ensure that development would not be harmful to the hedgerows on the boundaries of the site and where possible reinstate the hedgerows.

Paddock Sites - SR17

Emerging development and design principles

1. Up to 10 dwellings.
2. Building materials should reflect the local materials.
3. New development should not intrude upon the skyline.
4. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development and the setting of the conservation area.
5. The woodland to the north of the site must be retained and incorporated into any development.
6. Ensure that development would not be harmful to the hedgerows on the boundaries of the site.
7. Where illumination is proposed, it should be designed to avoid intruding into areas where darkness is valued as a characteristic feature of the village.

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APPENDIX 3

Development Sites and Local Green Space - Rural Areas

HALLATROW

- SR21 Land north of Wells Road
- SR22 Land south of Wells Road

TEMPLE CLOUD

- SR23 Land north of Temple Inn Lane
- SR24 Land south of Temple Inn Lane

TIMBURY

- SR13 Land west of Southlands Drive
- SR14 Wheeler's Yard
- SR15 Land east of St Mary's School
- GR7 Route and corridor of the Somersetshire Coal Canal
- GR8 Woodland west of Southlands Drive
- GR9 Land west of the Farnborough Road
- GR10 Timbury Recreational Field
- GR11 Old Upper and Lower Conygre Pits
- GR12 Allotments off Luppitt Lane
- GR13 Land west of Radford Hill
- GR14 St Mary's school playing field
- GR15 North of Lansdown Crescent

Core Strategy Policy RA1

Villages outside the Green Belt that have at least three key facilities and a daily Monday to Saturday public transport service to main centres will be expected to accommodate around 50 dwellings during the Plan period in addition to small sites within the Housing Development Boundary (HDB). Through the Placemaking Plan sites are being identified, where possible, to accommodate this housing.

Core Strategy Policy RA2

Some limited residential development of around 10-15 dwellings, in addition to small sites within the HDB, will be allowed in those villages not meeting the criteria of Policy RA1 and located outside the Green Belt. Through the Placemaking Plan sites are being identified, where possible, to accommodate this housing.

Villages excluded from the Green Belt

There are a number of larger villages that are 'excluded from the Green Belt' where a Green Belt inset boundary is defined. Housing development can come forward within the HDB at these villages. Opportunities outside the HDB are limited and will be considered in the context of Green Belt policy. There are currently no exceptional circumstances to change the Green Belt boundary to enable housing to come forward. These villages may not be able to deliver the number of dwellings envisaged through Policies RA1 or RA2 and therefore, no such allowance or expectation is included in the housing land supply.

Villages 'washed over' by the Green Belt

There are also a number of villages in the District that are 'washed over' by the Green Belt, which means that restrictive Green Belt policies apply. Under the existing Local Plan only limited infilling, partial or complete redevelopment of a brownfield site or subdivision of an existing dwelling is acceptable within the HDB, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including the settlement in it. It is proposed that the current policy approach is taken forward in the Placemaking Plan and that HDBs will be reviewed (see below). This would continue to provide certainty as to where residential development would be acceptable in Green Belt settlements.

Context

The Core Strategy seeks to restrain new development in rural areas, although provision is made to meet local needs, such as affordable housing, and to benefit the rural economy. New development is focussed at those settlements which have a range of local facilities and good public transport access. The strict controls relating to development in the Green Belt will continue to apply.

The Core Strategy currently sets out housing expectations in the rural area of around 1,100 dwellings over the Plan period of 2011-2029. To deliver this growth in the rural areas the Core Strategy has a number of policies which will be applied to the villages within the District.

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Development sites

The site allocation options and local green space designation options have been informed by the work undertaken by the Parish Councils which has been carefully reviewed and, where necessary, supplemented by the Council.

The Council has sought to put forward deliverable development options that will ensure much-needed homes are provided whilst protecting and enhancing the character of the villages.

However, not all of these site options for residential development identified in the Placemaking Plan Options document will need to be allocated in order to meet the housing numbers required by the Core Strategy for Policy RA1 and RA2 villages.

There are a number of other villages in the area where no proposed options for site allocation. This includes Camerton, Clutton, Farrington Gurney and High Littleton. However, during the Placemaking Plan period development could come forward and would be considered on its individual merits against national and local planning policy.

Local Green Space

All Town and Parish Councils were requested to assess and identify areas of green space that they want protected from development.

It must be demonstrated that these spaces meet the three criteria set out in national planning policy (the NPPF) relating to proximity and importance to the local community and the physical extent of the space.

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Development Sites - Temple Cloud and Hallatrow

Land north of Temple Inn Lane - SR24

Emerging development and design principles

1. A housing development of about 25 dwellings.
2. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this location.
3. Building materials should reflect the local materials and styles.
4. Ensure that undeveloped parts of the site are given suitable landscape treatment in order to achieve an appropriate relationship with development on site and the wider area.
5. Maintain or strengthen the integrity and connectivity of the green infrastructure network.
6. Ensure that development would not be harmful to the hedgerows on the boundaries of the site and where possible reinstate the hedgerows.
7. Any potential development would need to ensure that the setting of the Grade II Listed Temple Inn Public House is not harmed.
8. Retain the public right of way that passes through the site, aiming to integrate this successfully into the development to enable its safe use.

Land south of Temple Inn Lane - SR24

Emerging development and design principles

1. Up to 25 dwellings.
2. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this location.
3. Building materials should reflect the local materials and styles.
4. The site should be designed to safeguard the amenity of neighbouring residential properties around the edges of the site.
5. Ensure that undeveloped parts of the site are given suitable landscape treatment in order to achieve an appropriate relationship with development on site and the wider area.
6. Maintain or strengthen the integrity and connectivity of the green infrastructure network.
7. Ensure that development would not be harmful to the hedgerows on the boundaries of the site and where possible reinstate the hedgerows.

Land north of Wells Road- SR21

Emerging development and design principles

1. Up to 15 dwellings.
2. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this location.
3. Building materials should reflect the local materials and styles.
4. The mature trees and hedgerows on the boundary of the site must be protected.

Land south of Wells Road- SR22

Emerging development and design principles

1. 10-15 dwellings.
2. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this location.
3. Building materials should reflect the local materials and styles.
4. The site should be designed to safeguard the amenity of neighbouring residential properties to the north of the site.
5. Any development will need to respect the setting of Grade II Listed Tannery Court Farm and the surrounding green infrastructure.
6. Precautionary measures to avoid disturbance to nesting birds and barn owls if present.
7. Provision of measures to enhance the site for biodiversity including native planting; mixed species seeding of lawns and gardens; provision of nest boxes and hedgerow boxes.

Bath & North East Somerset Placemaking Plan Options November 2014

APPENDIX 3

Development Sites - Timsbury

The map displays several green space areas highlighted in green, labeled GR7, GR8, GR9, GR10, SR13, and GR11. A pink area labeled SR13 is also shown. Labels 'Ref No GR7' and 'Ref No GR13' are placed near the green areas.

Proposed Local Green Space: Route and corridor of the Somersetshire Coal Canal - GR7

This site is not suitable for consideration as a Local Green Space Designation for the following reasons:

- The site is not close to the core of the village.
- The site is an extensive tract of land which consists of many fields (the area is approximately 11ha).

Proposed Local Green Space: Land west of Radford Hill - GR13

This site is not suitable for consideration as a Local Green Space Designation for the following reasons:

- The site is not close to the core of the village.
- The site is an extensive tract of land which is approximately 5.6ha in size.

Land west of Southlands Drive - SR13

Emerging development and design principles

1. About 25 dwellings on the site.
2. The design should be a conservation lead design with the land north of the site being maintained as a green space.
3. Ensure that undeveloped parts of the site are given suitable landscape treatment in order to achieve an appropriate relationship with development on site and the wider area.
4. Maintain or strengthen the integrity and connectivity of the green infrastructure network.

Proposed Local Green Space: Woodland west of Southlands Drive - GR8

This area of green space meets the NPPF criteria for Local Green Space for the following reasons:

- The site is used by children, as a picnic area and for seasonal leisure activities.
- The site has many bird species including owls.
- The site is 1,023m² in size and is not considered to be an extensive tract of land.

Additional information on how the site accords with the other NPPF criteria is required before any recommendation can be made.

Bath & North East Somerset Placemaking Plan Options November 2014

Development Sites - Timsbury

The map displays several green space areas highlighted in green, labeled GR9, GR10, SR14, GR11, and GR12. A pink area labeled SR14 is also shown. Labels 'Ref No GR9', 'Ref No GR12', and 'Ref No SR14' are placed near the green areas.

Proposed Local Green Space: Land west of Farmborough Road - GR9

This site is potentially not suitable for consideration as a Local Green Space Designation for the following reasons:

- The site is not close to the core of the village.
- The site is washed over by the Green Belt.
- The site is an extensive piece of land which is approximately 7ha in size.

Proposed Local Green Space: Timsbury Recreation Ground - GR10

This area of green space meets the NPPF criteria for Local Green Space for the following reasons:

- The site is 2.4ha in size and is not considered to be an extensive tract of land.

Additional information on how the site accords with the other NPPF criteria is required before any recommendation can be made.

Wheeler's Yard - SR14

Emerging development and design principles

1. Employment space and about 25 dwellings on this site.
2. Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this sensitive location.
3. The site should be designed to safeguard the amenity of neighbouring residential properties to the south of the site. Ensure that development would not be harmful to the batch on the site.
4. Building materials should reflect the local materials and styles.
5. Ensure that undeveloped parts of the site are given suitable landscape treatment in order to achieve an appropriate relationship with development on site and the wider area.
6. Maintain or strengthen the integrity and connectivity of the green infrastructure network.
7. Provision of measures to enhance the site for biodiversity including native planting, mixed species seeding of lawns and gardens, provision of nest boxes and hedgehog boxes should be included in any site design.

Proposed Local Green Space: Old Upper and Lower Congrye Pits - GR11

This area of green space meets the NPPF criteria for Local Green Space for the following reasons:

- The site has protected species on site which includes badgers and there is a possibility of bats roosting on the site.
- The site provides an area for breeding birds.
- The batch is a reminder of the village's former Somersetshire coal mining industry.
- The site is 8,022m² in size and is not considered to be an extensive tract of land.

Proposed Local Green Space: Allotments off Lippiatt Lane - GR12

This area of green space meets the NPPF criteria for Local Green Space for the following reasons:

- The Timsbury allotments can improve people's quality of life, increase physical exercise and support mental health.
- The Timsbury allotments are also important for biodiversity.
- The site is 7,533m² in size and is not considered to be an extensive tract of land.

Bath & North East Somerset Placemaking Plan Options November 2014

APPENDIX 3

Development Sites - Timsbury

North of Lansdown Crescent - GR15

This area of green space meets the NPPF criteria for Local Green Space for the following reasons:

- The site is 2.6ha and is not an extensive tract of land.
- The site is close to the village facilities including the village shops, public house and the village hall.
- The site was identified as a 'visually important open space' in the 2007 Local Plan.
- VIEWS towards Lansdown (Bath).
- To the east there are views of Tunley.
- There are long views towards the Cotswolds AONB and Bedford's Tower in Lansdown.

With regard to land north of Lansdown Crescent (and related to development site allocation options above) two options are put forward.

Options

- Local Green Space Preferred Option GR15A**

The Parish Council's preferred approach is that an area of Local Green Space (reference GR15A) is identified alongside an allocation for residential development covering part of the site (reference SR15).

2. Local Green Space Option GR15B

The alternative option would be that a larger area of land is designated as Local Green Space. Under this option none of the land to the north of Lansdown Crescent would be allocated for residential development (see SR15 above) and these homes would be accommodated on either of the two alternative site allocation options – SR14 or SR13.

Ref No GR15A

Ref No GR15B

Land east of St Mary's School - SR15

Emerging development and design principles

- Around 10 to 15 dwellings on the western part of the site.
- Maintain the open views to the north towards Farnborough Common and maintain a green wedge as part of a development scheme.
- Buildings within the development must have a 15m buffer from the mature trees on the site.
- Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this sensitive location.
- The site should be designed to safeguard the amenity of neighbouring residential properties.
- The public right of way (ref. BA2/34) on the site will need to be safe guarded in any development proposal.
- Ensure that undeveloped parts of the site are given suitable landscape treatment in order to achieve an appropriate relationship with development on site and the wider area.
- Maintain or strengthen the integrity and connectivity of the green infrastructure network.

Bath & North East Somerset Placemaking Plan Options November 2014

Consultation on the Placemaking Plan Options Document

27th November 2014 -5pm, 30th January 2015

COMMENTS FORM

Now is your chance to comment on the emerging options for key development sites and planning policy framework. When adopted, the Placemaking Plan, together with the Core Strategy, will be used for determining planning applications in Bath and North East Somerset up to 2029.

You are invited to comment on these emerging options which have been numbered in the Options Document for you to refer to in your response. **You are strongly encouraged to make your comments on-line via the Placemaking Plan webpage www.bathnes.gov.uk/placemakingplan.**

If you are using this form, please complete the form by filling in Part 1 with your contact details and use Part 2 for your comments on the emerging site principles and policy options. Please make it clear which site or policy or alternative options your comments relate to and if relevant what change to the policy or supporting text you are requesting. Please complete a separate form for each site, policy or supporting text you wish to comment on.

Please send your completed form(s) using email to placemakingplan@bathnes.gov.uk. Alternatively you can send the form to Planning Policy, Bath & North East Somerset Council, PO Box 5006, Bath BA1 1JG.

Your comments will be used to inform the next stage of the Placemaking Plan, the Draft Plan.

Part 1: Contact details			
Personal Details		Agent Details (if applicable)	
Title		Title	
First Name		First Name	
Surname		Surname	
Job Title <i>(only if applicable)</i>		Job Title	
Organisation <i>(only if applicable)</i>		Organisation	
Email		Email	
Address		Address	
Postcode		Postcode	
Date		Date	

Part 2: Comments on sites or policy options or supporting text

2.1. Which part of the Options document are you commenting on?

Please use the relevant reference from the Placemaking Plan Options document e.g. Policy reference or paragraph number for each comment you make.

2.2 Please make your comment as succinct as possible.

Please expand this box or attach a separate sheet if you require more space.

2.3 If relevant please state what change to the Plan you are seeking.

Please expand this box or attach a separate sheet if you require more space.

See our website for more information and to make your comments on-

line: www.bathnes.gov.uk/placemakingplan

Please note that names and comments will be published

Response to key issues from Placemaking Plan Options consultation

Plan ref in Options document	Key issue	Response
SITES		
BATH		
General	<p>Avon Wildlife Trust – support for reference to Green Infrastructure throughout Development and Design Principles</p> <p>Federation of Bath Residents Associations:</p> <p>The need for Central Bath to be treated as a “Place” in its own right.</p> <p>Correlation with the recently approved Transport Strategy.</p> <p>The use of Brownfield sites before Greenfield.</p>	<p>Noted</p> <p>The first point is recognised, and is better articulated through the amalgamation of the Core Strategy and the Placemaking Plan. More emphasis has been placed on the Transport Strategy, and it is not possible to insist on brownfield sites being used before greenfield.</p>
	<p>Bath Preservation Trust:</p> <p>The draft plan should contain a specific and relatively detailed policy for the Central Area as a whole (linked to the Central Area Policy within the Core Strategy)...Absence of such a policy risks incoherence of approach and cumulative harm to the OUV.</p> <p>An up-to-date Conservation Area Appraisal and Management Plan must provide the evidence base for the Placemaking Plan.</p> <p>Locally important heritage assets require identification. A Local List must provide the evidence base for policy.</p> <p>Design Principle Policies – the document should present an overarching policy for design principles, applicable to all sites, not just a statement of values. This will allow specific design policies for each site (relating to what is different and distinct) to be much clearer.</p> <p>Site ownership – in the case of sites wholly in the ownership of B&NES, this should be stated. B&NES ownership is the only way to ensure that</p>	<p>Joining the Core Strategy text with the Placemaking Plan helps to address some of these issues, as does the addition of Policy BD1</p> <p>Conservation Area Character Appraisals have been undertaken as part of the evidence base to inform the Placemaking Plan.</p> <p>Local list ...</p> <p>There is now an overarching design policy for Bath and reference has been made to the production of a Design SPD. It is also proposed to adopt the Building Heights Strategy an SPD.</p>

APPENDIX 4

Plan ref in Options document	Key issue	Response
	<p>some of the higher value aims of the plan are delivered rather than simply best price, which tends to push aspirational placemaking out through viability constraints.</p> <p>We would recommend the adoption of the Building Heights Strategy as an SPD</p> <p>We remain to be convinced of the evidence base for the significant cumulative hotel bed spaces proposed in the options.</p> <p>The document reads as though it has been written by several different authors and requires greater consistency.</p>	
	<p>Historic England welcomes such a proactive initiative that establishes a series of design principles to inform and help ensure high quality contextual development that can sustain, complement and enhance the historic environment, townscape, landscape, assets and their settings.</p>	Noted
	<p>CARA & TARA: The importance of residents of in the city centre needs to be recognised.</p>	This has been taken into account.
	<p>Environment Agency</p> <p>It is important that the Placemaking Plan continues to apply a sequential approach to uses within the Enterprise Area, given the varying flood risk across the area. This requirement was discussed in detail at the Core Strategy stage and will need to be demonstrated through the evidence base for the Placemaking Plan.</p>	This has been taken into account.
	<p>Student housing is a key issue in the city and requires its own policy approach</p>	This has been taken into account.
	<p>Design Values are welcomed in principle</p>	Noted
	<p>The lack of available, suitable land for allotments in the area may require innovative solutions such as rooftop allotments and access to former</p>	Noted

APPENDIX 4

Plan ref in Options document	Key issue	Response
	private allotment sites (e.g. Lansdown View). Different types of informal food growing should be encouraged	
	Proposal for a River Strategy is supported	Noted
	Importance of maintaining the dark river corridor for the benefit of bats generally supported.	This has been taken into account.
	Student housing – concerns at the growth of the Universities and their impact	Noted
	Support for a robust approach for dealing with building heights in the city	This has been taken into account.
	Transport problems within Bath are regarded as the most crucial issues to address.	Noted
SB1	Allocate sites for further student accommodation blocks within the city	Insufficient land within the city. There would be an opportunity cost re uses that are given higher priority re Core Strategy Policy B5
	Welcome the repair of the historic street pattern, the mix of uses, preserving views, and emphasis in the form, function and scale of buildings. Existing function of the bat roost should be embraced, and dark corridor maintained Hilton Hotel should be demolished; Riverside path should be improved and implemented, Cornmarket building should be fully restored, market use to be retained. The site should be the primary focus for additional retail floorspace within the city.	Noted
	General support for approaches but recognition of sensitivities of area is paramount.	Noted

APPENDIX 4

Plan ref in Options document	Key issue	Response
SB3	General support for approach, concern over clarification of some wording, support for open space	Noted
SB4	Support approach of a delivering fine grained development, and new footbridge in this location, recognition of importance of the dark corridor, importance of view and overlooking from Beechen Cliff. Concern over basement parking	Noted
SB5	Retention of historic assets including the listed buildings and the public realm is generally supported. Importance of views and sensitivity of building heights.	Noted
SB6	Support general approach and aspirations set out, but recognition of the complexity of the area, the range of land ownerships and the impact of this on site delivery	Noted
SB19	BWR SPD should undergo a critical review. Area highly desirable for cycling,	Noted
SB13	Not suitable for student housing	Noted
SB7	Bulky goods retailing not considered suitable. The building's historic significance should be retained	Noted
SB8	Ecology & GI should dominate the nodal character of the site. A commitment to create a new cycling and pedestrian bridges over Windsor Bridge Road and Lower Bristol Road should be included	Noted
SB11	The site and policy should include Weston Island	Noted
SB15	Development should be fine grained and respect the existing street pattern and plot layout.	Noted
SB18b	Not suitable for student housing. The old rail line should be made into a	Noted

APPENDIX 4

Plan ref in Options document	Key issue	Response
	cycle route before a new development	
SB26	<p>Call for a Student Housing Policy.</p> <p>The Policy should make reference to number of affected heritage assets including the World Heritage Site and also an adjacent scheduled monument. It should be highlighted that any development needs to positively respond to such context.</p> <p>University of Bath welcome the requirement for development to respond positively and sensitively to the AONB and to improve the visual and landscape relationship with neighbouring land especially Bushey Norwood. The University of Bath (the University) would welcome the inclusion of a policy in the Place Making Plan (PMP) that recognises the importance of the University to the city, and reflects the support enshrined in Core Strategy (CS) Policies B1 & B5 and extant Local Plan (LP) Policy GDS.1/B11 for the continued development of the Campus.</p> <p>Development is required to enable the sustainable growth of the university and enhancement of its campus in accordance with its Masterplan.</p> <p>Clearly a difficult balance here between encouraging academic advances and providing accommodation close to educational facilities to minimise travel and free up potential family housing and damage to the Green Belt.</p> <p>This area is a highly desirable area for cycling with opportunities for multiple improvements for cycling including low gradient route from the city centre.</p> <p>We would like the emerging policy approach on the future development of the University Campus at Claverton Down to incorporate policies to address the following concerns we have from the perspective of</p>	Noted

APPENDIX 4

Plan ref in Options document	Key issue	Response
	residents on the hill.	
SB31	Recommend that policy wording makes reference to the significant levels of bat activity	Noted
KEYNSHAM		
General	English Heritage believes that the Keynsham section provides a series of positive initiatives that will help to advance the quality of the townscape and public realm, enhancing the character and appearance of the Conservation Area.	Noted
SK2 Somerdale	<p>Policy SK2 should reflect the requirements of the existing planning permission and not impose new requirements above and beyond those required through the extant planning permission for the site; SK2 should be amended: (2) permission is for up to 11,150sqm of B1 <u>employment</u> space; (6) permission allows for up to 1,000sqm for a new medical facility (use class D1); should planning permission be granted for 14/05811/EFUL prior to submission of PMP the policy should be further amended to reflect the change in use permitted.</p> <p>It is surprising that the section makes no reference to the important Roman archaeology and how development is expected to respond.</p> <p>SK2 should include the importance of and need for high quality care accommodation in the locality, which has been justified through a Needs Assessment; SK2 should consider the wording of the policy to mention the overriding need to supply high quality care accommodation and care development which should be included in the list of types of development that the site will accommodate.</p>	Changes made. Reference is now made to the Roman archaeology. Covered by Policy H1.
SK3 Ashton Way Car Park	Potential to significantly reduce parking provision if leisure centre relocated here/	Site is no longer available for development and is not being allocated

APPENDIX 4

Plan ref in Options document	Key issue	Response
	Potential to harm Conservation Area setting; visual impact Site is not large enough for a leisure centre. District Heating supported.	
SK4 Riverside Offices and Fire Station	English Heritage welcomes the policy which will help to ensure a high quality responsive sustainable development. General support for redevelopment. Essential that Fire Station and Riverside are considered together. Development should not detract from the park. District Heating supported.	Noted Noted Policy KE2b has taken this approach Policy KE2b seeks to ensure development has a positive relationship with the park, links the park to Temple Street, and enhances the park with green infrastructure improvements Noted
Pixash Lane Waste Site	Transport improvements needed.	Site incorporated into Policy KE3a; policy requires off-site highway capacity improvements
SOMER VALLEY		
General	General support on the locations of new development sites by the Highway Agency. The need to steer development to low value brownfield sites and avoid high value ones in accordance with the NPPF.	Noted.
Education	Planning for the growth in Midsomer Norton in a comprehensive and holistic way allows for proper provision to be made for the long term. It is necessary for BANES and Midsomer Norton Town Council to actively engage and work with Mendip and Somerset Councils to identify the most appropriate location for a new school.	Land at Silver Street is safeguard for education purposes under Policy LCR3 to facilitate the provision of increased primary school capacity in the Somer Valley. The Council will continue to work with Mendip and Somerset Councils.
HG4	Objections - there is a need for housing to be located outside settlement boundaries and that this should be the subject of positive and proactive planning for sustainable development.	The Housing Development Boundary was reviewed and amended accordingly. Please see 'Placemaking Plan Housing Development Boundaries Review'.

APPENDIX 4

Plan ref in Options document	Key issue	Response
SSV1, SSV2, SSV4, SSV6, SSV10, SSV14, SSV17, SSV20	The evidence gathered and applied to inform site allocations is not clear and does not appear to form part of the Plan's evidence base. English Heritage would welcome a meeting with officers to appreciate the rationale behind these allocations and understand how the historic environment has informed proposals and any key design parameters.	A meeting was held with English Heritage to discuss site allocations. The comments from English Heritage and internal Conservation Officers have informed the Development and Design Principles of the allocation sites.
SSV3	Natural England welcomes the recognition of the fact that this area is known to be significant for commuting and foraging bats. To be absolutely clear, Natural England regards the Five Arches path as supporting, functional habitat for the bat SAC and therefore it is essential that it is protected in the same way as the SAC itself. Maintaining the path as a dark corridor is essential.	Noted. Policy SSV3 Development Requirements include 'appropriate ecological mitigation to be included for bats, reptiles and invertebrates. Bat flight lines are to be maintained and no increase to light levels along this boundary.'
SSV3	Protect the former Somerset and Dorset railway as a linear walkway and potentially reuse as a railway for the Somerset and Dorset Railway Heritage Trust	This section of the former railway is implemented as part of the Five Arches cycle route.
SSV4	<p>The representation on behalf of the land owner includes;</p> <ul style="list-style-type: none"> -confirmation of availability -mixed use; C3 residential 70% (approx. 300 dwellings), Employment 30% (A1 retail), community facilities, associated private and public car parking and associated public realm and landscaping. -request to extend the site boundary to include the adjoining Stones Cross Public House and Social Club and to the west to reflect the land ownership. -The former Brewery Building in a poor state of repair. -issues regarding the safety of Station Road and retention of the former Brewery Building 	<p>Noted.</p> <p>Policy SSV4 facilitates mixed use redevelopment comprising residential and employment uses including small scale retail.</p> <p>The boundary is extended to reflect the land ownership. Not sufficient evidence was obtained to extend the boundary to include the Stone Cross Pub.</p> <p>The former Brewery Building has most of their external architectural feature intact and potential to enhance the appearance of the Conservation Area. Therefore the Development requirements reflect this.</p>

APPENDIX 4

Plan ref in Options document	Key issue	Response
SSV6	The site should not be allocated because of lack of delivery since the Local Plan was adopted, as well as possible highway issues related to providing a larger development at the site.	Agreed.
SSV9	Objection to the allocation by local residents. The problems and issues from the existing development are not resolved yet and further development will worsen the environment.	Land to the west of Paulton House has been removed from the allocation to reflect concerns raised by respondent and the fact that they are not making land available for development.
SSV9	Support for the allocation of the Old Mills for mixed use including employment, care homes and schools which are required to provide necessary services for the expansion of the town.	Support for allocation noted; site is allocated for B1c, B2, B8, builders merchants and car show rooms (<i>sui generis</i>) which reflects its designation as a strategic industrial site, and a government designated Enterprise Zone. The site is required to provide a long term supply of new employment land. Care homes and schools are not appropriate or supported in this location.
SSV9	Support for the allocation of employment use	Noted; site allocation amended to reflect land availability and new site being promoted.
SSV10	Natural England: Allocation of this site needs to respect its situation adjacent to the Norton Radstock Greenway and to protect and enhance this important linear route for ecology.	The site is part of the Strategic Industrial Sites in Midsomer Norton. Policies NE1, NE3 NE4 and NE5 are particularly relevant to protect and enhance biodiversity.
SSV11	Concern raised over the habitats issues.	Planning permission (14/04003/OUT) was granted, however Policy SSV11 sets out Development Requirements and Design Principles in case revised scheme comes forward. The Policy requires various measures to address the habitats issues.
SSV11	The supporting text to the emerging policy approach to SSV11 should be changed to reflect the ecological issues and the site capacity.	The policy approach has been revised to reflect the key issues/ site capacity identified through the planning application process.
SSV14	The Site is adjacent to a route which is thought to be used by bats to commute between the Bath and Bradford on Avon SAC and the Mells Valley SAC. Natural England therefore welcomes the inclusion of the	Noted. The Wellow Brook forms part of the Strategic Green Infrastructure network.

APPENDIX 4

Plan ref in Options document	Key issue	Response
	requirements in relation to bats at paragraph 6. The Wellow Brook ecological corridor should form a more multifunctional Green Infrastructure route, incorporating a riverside walkway.	
SSV14	The site should be allocated for employment or other appropriate Town Centre uses including a doctor surgery.	Noted. The site is allocated for mixed use scheme encompassing town centre uses.
SSV16	It is important to keep as much as possible of the building structure in tact to protect cultural heritage in Town.	The site is not allocated but the Placemaking Plan sets out key opportunities and constraints which help to address the heritage issues if development comes forward in future.
SSV17	It should avoid over development with an adequate parking provision	The Policy requires around 10 dwellings. Policy ST7 and Schedule 2 assist an adequate parking provision.
SSV18	Concerns were raised for residential development.	Policy SSV18 is revised to facilitate education facility led mixed use development.
SSV20	Natural England: endorse the emerging policy approach and include 'Appropriate mitigation to be included for bats which takes account of the significance of bat populations in this area.'	Noted.
SSV20	The site should not be allocated taking into account the heritage and bat issues	Development requirements and Design Principles guide appropriate mitigation and enhancement.
SSV20	The land owner supports the principle of using the site for residential purposes but the conservation and reuse of the former school building proposed in the draft policy cannot be taken forward. It is therefore respectfully requested that this aspect of the policy is removed.	Noted. Development requirements and Design Principles reflect the comments from internal specialist officers and the decision by the Planning Appeal Inspector (APP/F0114/W/15/3006257).
New sites for residential led development	More sites should be allocated. The Placemaking Plan should allocate additional greenfield sites adjacent to the HDBs. The plan should be made more flexible and include additional sites at Midsomer Norton to ensure it is able to respond to the evidence from the emerging West of	The Placemaking Plan complements the Council's Core Strategy (July 2014). The Core Strategy SV1 enables around 2,470 dwellings in the Somer Valley area. SHLAA shows that no further greenfield sites are

APPENDIX 4

Plan ref in Options document	Key issue	Response
	<p>England SHMA. Joint working with adjoining authorities.</p> <ul style="list-style-type: none"> • Land to the rear of Writhlington Court (RAD23) • Land off Silver Street for mixed use residential development catering primarily for the elderly to include a retirement village. • land North of Kilmersdon Road, Manor Farm, Haydon, Radstock (RAD31c) • land adjacent to the former Somerset Inn, New Pit, Paulton • Land at Chilcompton Road, Midsomer Norton • Land at Staddlestones, Midsomer Norton • Land at Bath Old Road, North Radstock (RAD 16a and 16c) land to the north of Fosseway Gardens, Westfield, Radstock • the Site at Tynning Hill, Radstock • the Old Pit Yard site (with expired planning permission) • land to the north of Fosseway Gardens, Westfield, Radstock • land to east of Church Road, Peasedown St John 	<p>needed to meet this housing target.</p> <p>The Housing Development Boundary was reviewed and amended accordingly. Please see 'Placemaking Plan Housing Development Boundaries Review'.</p>
New site for employment use	<p>Land off Langley's Lane - Land adjacent to the existing Old Mills Industrial Estate. The land is approximately 10 acres and is bounded by the industrial estate to the east, Langley's Lane to the north and Wellow Brook to the south and west.</p>	<p>Agree. Land off Langley's Lane is now allocated for employment.</p>
Radstock Railway	<p>Concerns were raised that the Placemaking Plan ignores several of the policies designated in NPPF particularly recognising the intrinsic character and beauty of the countryside, conservation of heritage assets, fullest possible use of public transport and, most importantly, support sustainable rural tourism.</p> <p>An opportunity to reinstate a railway should be taken.</p>	<p>Noted. The route is safeguard as Sustainable Transport Routes through Policy ST2.</p>

APPENDIX 4

Plan ref in Options document	Key issue	Response
RURAL AREAS		
SR1	The site would contribute negatively on the existing road network.	A Highways officer has been out on site and has concluded that there is suitable access onto the site and there would not be a negative impact on the existing road network.
SR2	The site would contribute negatively on the existing road network.	A Highways officer has been out on site and has concluded that there is suitable access onto the site and there would not be a negative impact on the existing road network.
SR2	The site is regularly floods.	Noted and agreed. The site has been subject to a surface flooding assessment and the recommendations from that survey have been incorporated into the development and design principles for the site.
SR5	Concerns were raised that any development on the site would harm the setting of the conservation area and the AONB.	A conservation officer has been out on site and has concluded that a low density heritage led scheme on the site could be acceptable.
SR5	Issues have been raised that the site is too remote from the housing development boundary and the village facilities.	The site is within walking distance of the village shops and bus stops (approximately 618m to the shops and 650m to the school).
SR5	The proposed density is too high on this site.	The density for the site has been reviewed and the capacity of the site has been set at 10 dwellings.
SR5	The site has an Agricultural land classification and is not brownfield.	This error has been rectified and the Placemaking Plan text has been updated to reflect this agricultural classification.
SR6	Issues surrounding parking have been raised. Parking in Water Street itself and in the road leading to the proposed development is known to cause problems of access to houses by delivery vans, and could block access for emergency vehicles.	A Highways officer has been out on site and has concluded that there is suitable access onto the site and there would not be a negative impact on parking or an impact on emergency vehicles gaining access into the site. Further any future planning applications would need to demonstrate how they will address the parking and access for emergency vehicles.
SR6	Issues have been raised with regards to the surface water run off	The site has been subject to a surface flooding assessment and the

APPENDIX 4

Plan ref in Options document	Key issue	Response
	flooding properties on Middle Street.	recommendations from that survey have been incorporated into the development and design principles for the site.
SR6	The potential density (10 dwellings) on this site has been raised as an issue. Concerns include that this would be an over development of the site.	The density for the site has been reviewed and the capacity of the site has been reduced to about 8 dwellings. Outline planning permission has been granted since the issues and options stage for 8 dwellings.
SR6	The site has been described as 'improved grassland' in the Placemaking Plan however several stakeholders have stated that the site is a former orchard.	Historical maps indicate that the site was a former orchard. The site description shall be changed to 'a former orchard'.
SR6	Concerns have been raised over the biodiversity on the site and the need to incorporate a dark buffer strip around the site.	The principles for the site have been updated to better reflect the recommendations in the draft Placemaking Plan Habitats regulations assessment and will now make reference to dark strips.
SR7	The land is Grade I agricultural land.	The site has been subject of more detailed analysis using natural England's Agricultural Land Classification Map South West Region (ALC006). The record was published on 24 August 2010. The land has been identified as being Grade I agricultural land. All rural sites have been subject to an additional land Grade Classifications survey.
SR13	Concerns have been raised that Southlands Drive is too narrow and congested to allow access to further vehicles.	Highways engineers were consulted on SR13 and determined that Southlands Drive would have capacity for additional car movements.
SR13	Comments were raised with regards to no references being made for the protection of adjacent mature trees	Noted.
SR13	No detailed reference is made to protect the spectacular views across the Cam Valley and the Mendip Hills beyond.	Landscape comments were incorporated into the SR13 emerging development and design principles.
SR14	It is unclear whether the 1.48ha area of the site referred to incorrectly includes the area shown in the map which is offsite and which includes current housing.	Noted. The map boundary has been amended and is now clearer.

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SR14	The Vision should include employment by inclusion of a new paragraph with text such as; 'The previous employment use of the site should be preserved at least in part'.	Noted and Draft Placemaking plan text will be updated to reflect this point.
SR15	The mature tree boundary is not considered 'distinctive' as described because the trees are not very old and include only two species, beech and ash, especially compared to many other rows of trees in the area.	An arboricultural survey has been undertaken and the trees have been identified as being important. The planning principles for SR15 have been updated to reflect the results of the survey.
SR16	The site boundary is incorrect-CURO do not own the hard standing next to the garages.	Noted. Further investigations have revealed that the site boundary is in two different ownerships and the site boundary has been amended accordingly and the site area decreased as a result.
DEVELOPMENT MANAGEMENT POLICIES		
Residential Development		
H1 Housing and Facilities for the Elderly, housing for people with other Supported Housing or Care Needs	<p>BPT generally agree with the policy approach</p> <p>HBF consider the impact of the Housing Standards review needs to be taken into account in making this policy</p> <p>SW HARP Planning Consortium support the inclusion of the policy, but note concern re para 2.13 and option 2 as the consider the distinction between C2 and C3 is important – with various care and extra care models straddling within C2 and C3 use class definitions. Support the opportunity for indicators of use class to be included within the policy e.g. volume on non-saleable space, minimum care requirements (secured through s106), occupation restriction etc.</p> <p>Strategic Land Partnerships – local housing need surveys are required</p> <p>Transition Bat/Bath Area Growers - support mention of raised beds for residents to do their own gardening and for grounds to include a vegetable plot and have daily needs shopping opportunities within reasonable walking distance. Strongly agree with areas being home</p>	<p>Include more detail on criteria for C2/C3 distinction</p> <p>Update census data</p>

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Plan ref in Options document	Key issue	Response
	<p>zones</p> <p>Purpose built flats in isolated locations will not serve as well as city centre locations where residents are close to amenities</p> <p>Wadderton Park Ltd. – data is out of date and should go up to 2029 – reference to cycle parking is inappropriate as majority of residents would not use this (although some facility for staff/visitors would be needed)</p> <p>McCarthy & Stone retirement lifestyles Ltd – support the policy and willingness of the Council to engage on the issue. There is significant variation in the extra care concept. Offer a visit an extra care development to provide further insight into this care model.</p> <p>Student Castle – reference should be made to NPPF para 17 re-use of brownfield land</p>	
H2 Housing Density	<p>Turley Associates/Persimmon Homes/Strategic Land Partnerships – support option 2 to be incorporated “Densities below 25 dwellings per hectare will not generally be supported, in order to make efficient use of land. However, lower densities could be justified as a result of function of character and design” or remove policy</p> <p>Strongvox Homes/Radstock Land LP/Wadderton Park Ltd. – do not support the inclusion of such a policy in light of NPPF para 59 – design policies should avoid unnecessary prescription</p> <p>Cycle Bath – agree as higher density supports cycling</p> <p>1 individual – supports Local Plan policy i.e. minimum density 30 dph</p> <p>CPRE – supports policy approach which acknowledges lower density should be pursued in rural areas</p> <p>Cllr Anketell-Jones – supports density policy in terms of efficient use of land</p>	Delete so that this becomes a function of the design policy

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	<p>Transition Bath/SW HARP Planning Consortium – support policy in current form. BPT support with reference to option 2</p> <p>Highways Agency – supports higher density with facilities with higher than normal densities</p> <p>HBF – such a policy will have a negative impact on self-build which is likely to be much lower density</p>	
H3 HMOs	<p>BPT – agree, add general presumption against the loss of family sized homes within walking distance to primary schools (exception in ii), plus, upper floors in shops should be safeguarded for HMO use (in line with the Local Plan policy HG.12 final para)</p> <p>University of Bath – support</p> <p>Bath Heritage Watchdog – Licensing to be integrated with Planning e.g. so no more than 6 units will be issued to any property and to confirm that enforcement action will be pursued. Comments re off-campus accommodation.</p> <p>BPT/Cycle – 1v should prioritise sustainable travel and cycling. Should cover cycle storage.</p>	No change to the policy approach suggested
H5 Self Build	<p>BPT agree with approach</p> <p>How will affordable self build be managed</p> <p>Delete on site requirement for self-build – no clear evidence of need</p>	2 nd para deleted – general supporting policy retained
H6 Retention of existing housing stock	<p>BPT agree with approach</p> <p>Agree – suggest including a reference to regeneration projects</p> <p>Refer to net loss</p>	Agree and new policy included in relation to regeneration sites
Accessibility Standards	<p>Include new policy approach to support continued standards for Affordable Housing and apply standards for market housing subject to evidence</p>	The results of the HSR were unknown

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H7 Boat dwellers	<p>General support for policy approach but plan should identify locations. Suggest that the topic is either split into two or the section title amended, as many moorings in the district are not used by or relating to boat dweller.</p> <p>Ensure no adverse impact on green corridors along river banks, their biodiversity or the habitat they provide.</p>	<p>Noted. The title of this section has been reframed as 'Moorings' to reflect the breadth of the topic area. Work has not been undertaken to understand the extent of the need for additional moorings and/or a marina so therefor little evidence on which to base a search for suitable locations. The policy sets out clear criteria with which to determine the acceptability of proposals that may come forward.</p>
Economic Development		
ED.1A New office development	The Highways Agency and Bath Preservation Trust supports Option 1 as sites within city or town centre boundaries will generally be more accessible via sustainable means of transport reducing the potential impact of development on the SRN.	Support welcomed and Option 1 policy approach taken forward.
ED.1B Change of use of offices to residential use	Bath Preservation Trust agrees with the policy approach. South West HARP would request reference to the demand for premises in the policy in line with practice elsewhere.	Noted.
ED.1C Change of use of office use to other town centre uses	Bath Preservation Trust agrees with the policy approach. University of Bath considers that the policy is too broad in its application and as a consequence would prevent a potential change of use of office space that would have an equivalent economic benefit for the city.	Noted. Policies ED.1B and ED.1C have been redrafted and should be clearer in their application.
ED.2A Industrial development	<p>Hallatrow Business Parks welcomes the inclusion of their premises within the policy considered that car showrooms should be acceptable in ED.2A locations.</p> <p>Part 2 of the policy is unclear and is contrary to NPPF paragraph 51, and also conflicts with Policy ED.2B.</p>	Support welcomed. Clause 2 has been redrafted for the purposes of clarity.
ED.2B Non-Strategic Industrial Sites	Objects to the terms of policy ED.2B as this will only worsen the loss of local workspaces for the cultural/ creative/ start-up industries which should be given the same protection level as strategic industrial sites	The approach taken in Policy ED.2B is compliant with the NPPF.

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	and their change of use to residential should be resisted until it is clear that the premises have been marketed widely.	
RE1 Employment uses in the countryside	Supports the concept of encouraging a thriving rural economy by permitting small scale business development in RA1 and RA2 villages but is concerned that extending this principle to villages within the Green Belt may have a damaging impact on visual amenity as well as giving rise to an unacceptable increase in traffic volume (particularly involving commercial vehicles). Policy should avoid being too prescriptive, as such policies tend to become overly long, complicated and stifling	Noted but employment uses in villages in the Green Belt will be subject to strict Green Belt policy with NPPF para 89 setting out exceptions - ref to national GB policy already in RE1 Policy is not considered to be over prescriptive
RE2 Agricultural development	Wish to see some specific reference made to the future of Prior Notification/AGRN in the emerging policy approach	LPA not in a position to change the GPDO through local planning policy
RE3 Farm diversification	Concerned that clause (iii.) conflicts with (ii), i.e. could allow loss of 9/10ths of agricultural function, modification required: Change "wholly" in (iii.) to "significantly".	Agree that replacing "wholly" with "significantly" would better reflect the purpose of the policy and avoid any confusion/ambiguity between .ii) and iii).
RE4 Essential dwellings for rural workers	Agree that for the reasons stated under Alternative Options it is better not to broaden the EPA RE4 to include part-time and seasonal workers	Noted.
RE5 Best and most versatile agricultural land	Numerous appeal decisions which confirm that the loss of high grade agricultural land is not a sufficient reason to refuse planning permission or even a matter which should be weighed up in the balance when considering development proposals	Noted but is NPPF compliant. (para 112) - policy as worded allows for this scenario.
RE6 Re-use of rural buildings	Conversion of buildings should not conflict with RE4. RE6, clause 4 may be too restrictive given the potential isolation of farmsteads and buildings	Noted. The policy has been redrafted to ensure that these points are addressed.
Centres and Retailing		

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CR1 retail development outside the centres	<p>Local needs retail threshold of 200sqm is too small and lacks justification; consumer requirements have changed, day-to-day shopping needs can be met conveniently in the 'local' type formats of supermarket operators, but cannot be met in isolated 200sqm units, which would be at risk of remaining vacant. Local type format needs to be in the order of 1,000sqm (net).</p> <p>Wish to see a policy that allows more bulky goods retail provision in Bath and Keynsham along good public transport corridors.</p> <p>Widcombe Parade local centre boundary is out of date and too restrictive; area should be expanded to incorporate the new Morrison's store, Social Club, White Hart, Baptist Church, Widcombe Surgery and attached office accommodation</p> <p>Priority should be given to shops providing daily needs e.g. fresh food Only when High Streets begin to show consistent and profitable trade patterns should we contemplate allocating out of town retail sites.</p> <p>Centres should be readily accessible by cycle, with infrastructure provision, and segregated tracks where there is a high volume of traffic</p>	<p>CR1 does not define 'local needs' shopping. It does however support small scale schemes (less than 280sqm) that comply with Policy CR4 (that also provide for local needs) by not requiring them to provide a sequential assessment as an exception to CR1. The glossary defines that local needs shops are defined by their function as opposed to any rigid size threshold. Any local needs shop proposal over 280sqm will still be required to submit a sequential assessment.</p> <p>Table 8 outlines the projected quantitative capacity for additional retail floorspace. Around 13,000sqm of comparison floorspace is allocated or anticipated to be delivered in Bath. There is no quantitative capacity for any additional retail in Keynsham.</p> <p>Boundaries of centres have been updated where required.</p> <p>Policy CR4 supports proposals for development of appropriately located small-scale local shops which provide for local needs (e.g. fresh food). The Core Strategy (CP12) supports a hierarchy of accessible centres, many of which are a focus for public transport services that are close to people's homes.</p>
CR2 Impact assessments	<p>Public consultation needed on the threshold for impact assessment</p> <p>Full traffic assessment also needed to assess whether the development has an impact on carbon emissions and pollution</p>	<p>Threshold has been set in line with the GVA evidence base.</p> <p>Traffic assessments are dealt with in the transport section.</p>
CR3 Primary shopping areas and primary shopping centres	<p>Encourage the development of an evidence base to support option 3</p> <p>Policy should be about protecting uses that contribute to maintaining the vitality, viability and diversity of centres within the hierarchy (not just retail); policy should be about neighbourhood vitality which derives from a mix of uses. Small scale uses such as cultural/creative/start-up businesses in or adjacent to centres should be protected (or at least a</p>	<p>CR3 now sets a more flexible approach for Primary Shopping Frontages acknowledging that retail can benefit from having diverse, non-A1 neighbours, creating a richer mix of footfall. This can add to the attractiveness and vitality of centres.</p>

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	marketing test required).	
CR4 Tables and chairs	<p>Encourage the development of a design guide for appropriate tables and chairs</p> <p>Policy should state that tables and chairs in the Conservation Area or in setting of listed buildings should not be enclosed by planters, fences or ropes and that there should be no commercial advertisements on the tables, chairs or umbrellas – these features have demonstrably harmed the street scene and visually privatised the public realm OR prepare some simple guidance if this is too detailed for a policy</p> <p>Point (i) should also refer to cycling</p>	See Urban Design policies
CR5 dispersed local shops	<p>Definition and threshold of local needs shops should be deleted and the term ‘small scale’ interpreted on the basis of its normal meaning and site-specific circumstances; the current definition would be counter-productive and would be likely to inhibit provision of quantitative and qualitative needs.</p> <p>Measures such as Health Impact Assessments should be required to control the proliferation of A5 premises</p> <p>For part (ii) of the policy, the supporting text should imply that if there is no realistic chance of the shops performing a continuing retail role, planning permission for change of use would be forthcoming for well-designed and sympathetic schemes</p> <p>When the Local Centres are reviewed, the shops at 5-8 High Street, Paulton, are removed from the designation.</p>	<p>The glossary defines that local needs shops are defined by their function as opposed to any rigid size threshold. Policy supports small scale shops in appropriate locations. Any proposals for larger shops (regardless of whether or not they are local needs shops) will need to be assessed against CR1 and CR2 (i.e. provide a sequential assessment and, if appropriate, an impact test).</p> <p>No basis for requiring Health Impact Assessments.</p> <p>Boundaries of centres have been updated where required.</p>
Fast Food Outlets	School children are not the only people who might be exposed to unhealthy foods from fast food outlets – e.g. university students and people living within areas of multiple deprivation	No evidence basis for a fast food policy

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Markets	A policy should contain options 1, 2 and 3 Objectives should be to increase the availability of fresh, preferably local, food	No evidence basis for a specific policy; Policy CP12 encourages their use in general
Green Belt		
Green Belt boundary	There have been a small number of requests to make amendments to the Green Belt boundary around the built up area of Bath.	<p>The five cases have been reviewed in the light of the NPPF and the Green Belt Review (Stage 1), for the Core Strategy. In all cases:</p> <ul style="list-style-type: none"> - the established Green Belt boundary follows readily recognisable physical features such as roads and hedgerows, in accordance with Government policy - there are no exceptional circumstances to justify removing this land from the Green Belt - no change is recommended to the Green Belt boundary at these locations. <p>See 'Requests for land to be removed from the Green Belt: Analysis and recommendations (December 2015)'</p>
Previously developed sites in the Green Belt	General support for not defining any boundaries around previously developed sites in the Green Belt but relying on the NPPF, para 89 for considering proposals. Chew Valley School and Prior Park College & Paragon School wish to be retained and Kingswood School to be designated as a Major Existing Development Sites (MEDS).	Noted. By not retaining the MEDS boundaries would not prejudice these institutions from achieving their redevelopment aspirations provided the terms of NPPF, para 89 were complied with. There is no overriding justification for retention of these boundaries for the purposes of providing certainty as the NPPF is quite clear what is permissible.
GB1 Visual amenities of the Green Belt	Mixed response to Policy GB1 (protecting visual amenities of the Green Belt) : in some saying it is an unnecessary policy restriction and other firmly supporting continuing this approach as taken forward from the Local Plan.	Points raised noted - amend policy wording to ensure consistency with NPPF and consider referring back to PPG2 wording as a starting point.
GB2 Development	Definition of 'infilling' needs clarifying in draft Policy GB2 (residential	Noted. Definition of infill is set out in para 2.171. The text has been

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in villages within the Green Belt	<p>development in villages in the Green Belt) to avoid misinterpretation with some saying the policy should not specify a restriction for residential development to limited infilling in villages and sites within the defined housing development boundary.</p> <p>Policy GB2 is not in accordance with the proposal as set out in paragraph 2.172 which will require further clarification by the Council.</p>	<p>updated to make clear that Housing Development Boundaries continue to be defined-for those washed over Green Belt villages in which infilling would be acceptable and to help avoid dispute over whether particular sites are covered by infill policies.</p> <p>Noted. Policy has been redrafted to eliminate inconsistencies between GB2 and para 2.172 which will bring policy into line with NPPF.</p>
Extensions to buildings in the Green Belt	Support for not having a policy but relying on the NPPF (para 89)	Whilst there was support for Option 2, given the significant number of householder applications in the Green Belt the Council feels justified in continuing the approach that where planning permission is required to extend any building a balance should be taken between the accommodation needs of householders and business against the desire to avoid the gradual erosion of the countryside and identity and character of settlements, contrary to the purposes of the Green Belt.
Replacement buildings in the Green Belt	Support for a dedicated policy.	Noted. Whilst there was support for Option 1 the NPPF takes a more flexible approach than previous Local Plans have taken considering proposals for the replacement or rebuilding existing dwellings in the Green Belt and is the approach the Council has opted for.
Urban Design		
General	<p>These policies are inconsistent with the NPPF as they are all negatively worded – consider revising wording</p> <p>Support, but consider the policies in this section to be repetitive, and that more concise policies should be considered (also overlap with H2 and ST7)</p> <p>Support the principle of these policies – but consider there should be a policy which relates to public realm – e.g. design and selection of</p>	<p>Agreed – minor tweaks to word these more positively</p> <p>Agreed - Policy H2 now subsumed into D2</p>

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	<p>materials for streets, public spaces, road signage and lighting Implementation of this policy is equally important</p>	Agreed – new policy D10 added in relation to public realm
UD1 General Urban Design Principles	<p>and that it should cross reference with principles on p11 Suggest including a greater emphasis on character – with reference to the WHS Policies must be supported by an up to date evidence base Consider “energy efficiency” part of this policy may need to be reviewed in light of the HSR Consider the use of the word “delight” to be subjective Consider the statement re landscape is too broad brush Sport England has prepared a developers checklist - summarised in the term “active design” creating new environments that maximise opportunities for participation in sport and physical activity – consider a more specific reference to active design and a reference to their guidance could be added to D1 Consider that national standards subsumed into national standards review should not be referred to in this policy as they are no longer supported nationally e.g. secure by design, lifetime homes, Code for sustainable homes etc. Energy efficiency is now covered in building regulations this reference should be deleted Strongly support – suggest also mentioning desire lines as well as accessibility Design for cycling should follow guidance similar to the Welsh Active Travel Guidance and that cycle and pedestrian audit tools should be utilised</p>	<p>Agreed overall structure edited</p> <p>This refers to energy efficiency in a broader sense – see e.g. now added to explain</p> <p>Already referred to in the guidance section – not appropriate to reference specifically in the policy most specific references now removed</p> <p>SBD and Building for Life are not a standard in this regard, they form useful guidance. Other standards are not specified or required.</p> <p>See above – this refers to energy efficient urban design in a wider sense as supported by the NPPF</p> <p>Incorporated a mention into D6 Amenity policy with cross reference to transport policy</p>

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	Support clause iii. All developments should have cycle parking and storage	
D2 Local Character & Distinctiveness	<p>Prefer the use of the word “respect” rather than “reflect”</p> <p>Should be specific reference to key documents in the policy e.g. Bath City Wide Character SPD</p> <p>Suggest merging policy H2 into this one so that density is a function of local character</p> <p>Should specifically support good modern innovative design and support historical styles where justified in order to re-unify lost composition</p> <p>Strongly agree with iii. Suggest going further to reduce car dominated frontages</p> <p>Cycle storage and cycle parking must be provided</p>	<p>Agreed - wording amended</p> <p>General reference added as there are too many key documents – a list is included in the policy section preamble</p> <p>Agree – policy H2 to be deleted and incorporated into D2</p> <p>Agree- incorporated into D5</p>
D3 Urban Fabric	Don't understand “reinstating “broken” parts of the settlement phrase	Re-phrased
D4 Streets and Spaces	Would like to see reference to trees and small wooded areas recognised in urban design terms (in line with their publication “Trees in Townscape” (June 2012).	Reference to street trees added and reference to the Trees in Townscape guidance added to preamble
D5 Building Design	<p>Well designed and well-articulated require points of reference – design values need to translate into specific policy</p> <p>Parts i. and ii. Need consideration as they overlap</p>	<p>Parts i and ii merged</p> <p>Specific policy for particular sites is included elsewhere in the plan – this policy seeks to set a framework that can apply to any development proposal</p>
D6 Amenity	<p>Agree with policy approach</p> <p>All developments should have cycle parking and storage (secure and convenient)</p>	Additional reference to cycle parking and storage added with cross reference to sustainable transport policies
D7 Infill and	Agree re option 2 here –advertising and shop frontages policy should be	Agree – a new policy UD9 is now included which is supported by more

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Backland Development	<p>carried forward in the PMP</p> <p>The opportunity for Neighbourhood Plans to define infill locally should be omitted – a district wide definition of infill should be used consistently</p>	<p>detailed guidance in relation to the Bath Conservation Area (Conservation Area Appraisals for other areas will also contain further detail e.g. Keynsham)</p> <p>Disagree, the ability to introduce a local definition of infill is within limited parameters and gives more flexibility to R.3 villages preparing Neighbourhood Plans.</p>
D8 Lighting	<p>Should refer to WHS and CA in Bath</p> <p>Should cover buildings, public realm, shops and site identification</p> <p>Strongly support inclusion of this policy</p> <p>Policy too detailed and unclear</p> <p>Support policy approach</p> <p>All new development should have LED not scatter street lights as per the Council's roll out for existing street lighting</p> <p>Qualify "dark corridors" to ensure safe pedestrian routes</p> <p>Cycle Routes must be considered for lighting</p>	<p>Support welcomed. Policy has been redrafted to relate to internal and external lighting both in settlements and the rural areas with reference to the Institution of Lighting Professionals guidance and BS 5489-1 2013. Any resultant safety issues from lower light levels are also addressed. Supporting text revised and expanded accordingly.</p>
Natural Environment		
General	Useful advice on how policy wording and consistency between policies could be improved.	Noted.
NE1 Green Infrastructure	<p>Natural England - General support for the emerging natural environment policy framework (GI, landscape, ecology, trees and woodland).</p> <p>Environment Agency pleased to see reference has been made in this section to key waterbodies (e.g. lakes, waterways) in the BANES area which provide multi-functional benefits for communities and the environment</p> <p>Canal and River Trust concerned that emerging Policy NE1 does not go</p>	<p>Policy redrafted and should address concerns raised.</p> <p>Reference to requiring an 'audit' removed in redrafted policy. Agree to include new clause along lines suggested.</p> <p>Disagree - if development had an impact on local GI then it will have a knock-on impact on the wider/Districtwide GI network. However, maybe better to replace 'District's GI network' with 'wider GI network' to allow for cases that may have a cross-boundary impact.</p>

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	<p>far enough to promote and protect existing GI assets or ensure the long term suitability of existing or new assets.</p> <p>Policy NE1 be reworded to require development proposals to demonstrate that they have had regard to existing green infrastructure networks and have maximised opportunities to design green infrastructure into the proposed development</p> <p>Reference to the green infrastructure ‘across the district’ should be removed. The development would unlikely impact the green infrastructure across the entire district, instead would impact local green infrastructure</p>	Reference to the Green Infrastructure Strategy has been removed in the redrafted policy
NE2 Landscape	<p>There is clearly a distinction between designated and un-designated landscapes; as recognised in paragraph 113 of the NPPF.</p> <p>Clause 3 is not appropriate - an impact” is not a suitable threshold.</p> <p>Policy should make specific mention of the WHS and OUV, and should reference the WHS Landscape Setting SPD.</p>	<p>Redrafted policy should address these concerns agree needs strengthening - make clear it is adverse impacts on landscape we are trying to avoid</p> <p>Noted but there are other policies that cover these points.</p>
NE3 Sites, species and habitats	<p>Weaker than the combination of the B&NES Local Plan policies in respect of providing mitigation and compensation for the impact on locally important and nationally important species</p> <p>Locally important species are not afforded adequate protection under this policy.</p>	Policy has been reviewed and comprehensively redrafted for the purposes of clarity, conformity and strengthened.
NE4 Ecosystem Services	<p>Cam Valley Wildlife Group considers there is a danger, in defining cultural and other services in brackets within the policy, that important elements of those services will erroneously be overlooked or deemed not to be as important as those specified.</p> <p>Avon Wildlife Trust supports the need for a dedicated policy and the proposal in point 3 that ecosystem services should be included within a Design and Access Statement and GI provision.</p>	Noted. Text removed from brackets and the terms referred to in supporting text.

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NE5 Ecological networks	<p>Wary of basing the mapping of ecological networks upon the presumption that the listed elements in para 2.238 are the key components.</p> <p>In order to have an effective network, protection is needed for the features or locations that will make up that network in the future</p> <p>Emerging policy NE5 is considered unnecessary due to its overlap with other policies in the plan. The policy should therefore be deleted.</p>	<p>Points raised noted. The elements listed in para 2.238 will be shown on the Policies Map - evidence underpinning this is informed by the recent West of England Nature Partnership work.</p> <p>Component parts of the ecological network will be protected under Policy NE3 whilst Policy NE5 is aimed at protecting the 'network'.</p> <p>Disagree, each policy cited has a distinct function and it is not considered there is a fundamental overlap between the policies.</p>
NE6 Trees and Woodland Conservation	<p>Natural England strongly supports the approach of a dedicated policy on protecting trees and woodland</p> <p>University of Bath supports the intent of these policies, but as currently drafted they are considered to be too prohibitive.</p> <p>Difficult to envisage a development proposal that could not be judged by someone to have an adverse effect on "trees" of perceived value and para 3 refers, perhaps more appropriately and practically, to veteran trees; maybe that is more what para 1 might be about.</p> <p>As currently worded emerging policy NE6 is not consistent with the NPPF as it does not allow for a balancing exercise/cost-benefit analysis to be undertaken.</p> <p>Woodland Trust would like para 3 NE6 amended to read: "Development proposals directly or indirectly affecting ancient woodland or ancient trees will not be accepted"</p>	<p>Support welcomed.</p> <p>Disagree. Policy is not considered too prohibitive</p> <p>Agree that policy should be reviewed to ensure consistency with the NPPF and to eliminate any conflict or inconsistencies within the policy.</p> <p>Clause 3 has been amended to ensure development proposals directly or indirectly affecting ancient woodland or ancient trees will not be permitted.</p>
Historic Environment		
HE1 Historic Environment	Historic England saw this as an opportunity to revisit, restructure and redraft this policy to help accord with national policy, avoid repetition and improve its clarity and reemphasise the value of the historic environment to the local economy.	Officers met with Historic England on 27 th April 2015 to discuss the issues raised through their representations. Policy HE1 and supporting text has been revised in the light of the points raised through this meeting, other representations and discussions with other colleagues.

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	<p>There should be clear reference to the protection of unlisted heritage assets and the policy must be supported with an up-to-date evidence base, in particular character appraisals and management plan for the Bath Conservation Area.</p> <p>First four paragraphs of Policy HE1 appear to be a restatement of parts of national policy with slight variations</p> <p>Focus of HE1 needs to be simply (as stated in Core Strategy policy B4) ensuring no harm to the Outstanding Universal Value of the World Heritage Site, its authenticity and integrity</p> <p>Policy refers to Conservation Areas and the necessary focus on the special character or appearance which justifies designation as an area of architectural or historical interest</p> <p>Delete reference to WHS management plan</p> <p>Elements of character and/or appearance which have justified designation of the conservation area concerned</p>	
Somersetshire Coal Canal and the Wansdyke	No keys issues raised - only positive feedback and unanimous support for Option 1 (English Heritage, Bath Preservation Trust, Dunkerton PC), a dedicated policy and to show routes on Policies Map.	Noted and policy developed in accordance with Option 1.
Meeting local community and recreational needs		
LCR1 Safeguarding local community facilities	<p>Theatres Trust supports LCR1 and suggest for clarity a succinct all-inclusive description of community facilities which would obviate the need to provide examples: community facilities provide for the health and wellbeing, spiritual, recreational, leisure and cultural needs of the community.</p> <p>Canal & River Trust note the Wansdyke and Somerset Coal Canal have their own policy suggest the Kennet & Avon Canal and/ or river corridor should benefit from a similar policy covering all aspects of it.</p>	<p>Agree to include a broad description of community facilities in the glossary.</p> <p>Noted. However the waterways including the Kennet & Avon Canal and/ or river corridor are covered by Policies NE1, NE3 and NE5 and thus safeguarded on the Policies Map.</p>

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Plan ref in Options document	Key issue	Response
Public Houses	Support for inclusion of a separate policy safeguarding against the loss of public houses	Support welcomed.
LCR2 New or replacement community facilities	Support for the policy approach.	Support welcomed.
LCR3 Land safeguarded for Primary Schools	New schools need to be designed and built to the benefit and encourage sustainable transport modes as the core means of travel to school for pupils and staff and should meet minimum as-built energy performance standards e.g. DEC 'A' ratings.	The policy merely safeguards the land. There are other policies which would address these points.
LCR5 Safeguarding existing sport and recreational facilities	Sport England is concerned that there does not appear to be a robust and up to date evidence base for sport and recreation in Bath and NE Somerset but that the Council's Leisure Team are working on producing one with adoption of a Playing Pitch Strategy by June 2015.	Noted. The Council now has an up to date Green Space Strategy and the Playing Pitch Strategy is nearing completion. The policy has been redrafted to address these and more detailed points raised by Sport England.
LCR6 New and replacement sports and recreational facilities	Woodland Trust's Woodland Access Standard (WAST) provide an important policy tool complimenting other access standards which can be used in delivering green infrastructure standards. On financial contributions the Council will have to be mindful that there is no perceived "double dipping" between CIL and S106 payments.	Woodland Access Standard (WAST) and Natural England's ANGST standards have been used and referred in the refreshed Green Space Strategy (2015) which will directly support the Placemaking Plan. Noted.
LCR7 Recreational development proposals affecting	Important to safeguard and improve routes along canals and rivers for cycling Canal & River Trust is concerned that the text does not make it clear	Noted. This will be dealt with as part of safeguarding recreational routes. Noted. Option 2 has been taken forward and Policy LCR7 is now

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waterways	when or how the five identified canal related sites were chosen or why they are still considered as the only possible locations for water related recreational development.	advocating a more flexible approach and as there is no evidence to justify the retention of the areas previously listed in the policy, the sites have been removed from both the policy and the Policies Map.
Telecommunications development	Historic England points out that Insensitive installation and location of apparatus can cause harm to designated and non-designated heritage assets including for example townscapes, archaeology and historic surfaces. Mobile Operators Association suggests policy wording.	Noted. The draft policy takes account of these points and has been informed by the wording suggested by the Mobile Operators Association.
LCR8 Protecting existing allotments	Support for policy approach for both allotments and informal growing the inclusion of amenity land for allotments is supported Define allotments – i.e. does the policy offer protection to private, temporary and statutory allotments Use the term “community value” in policy wording – rather than just “value” for clarity Mention orchards as amenity land for allotments Accessibility requirements were different in the previous policy in CF8 to the Green Space Strategy requirement. In addition, at 1000m the distance is potentially too far – 600m would be more appropriate. Support for green roofs, orchards etc. in the Placemaking Plan Transition Bath note that there is inconsistency and that there should be mention in other areas of the Placemaking Plan including site allocations (e.g. Enterprise Area), urban design and residential development.	Noted Fuller legal definition of allotments (private, temporary and statutory now included in introductory text). Policy wording in CF8 now amended to refer to “community value”. Orchards now included in relation to amenity land. No specific mention made in policy SCR8, as Green Space Strategy accessibility requirements will be applied. Site selection criteria link to accessibility requirements as defined in the Green Space Strategy (evidence base). Support noted The policies are read together so it's not appropriate to repeat. However, site allocations to include more detail on GI requirements and green space requirements where they can be justified on site. Updated Sustainable Construction Checklist can also reference this policy.
LCR9 Provision of	General Support	Noted. Policy broadened to refer to all major development.

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new allotments and community food growing space	<p>Include orchards in the list of growing space</p> <p>6x Support for option 4 (on-site provision), and mention of a Grampian condition</p> <p>4x Support for option 5 (CIL/s106)</p> <p>Comments made that on-site requirements for green space has not been met in the past</p> <p>Mention of good practice policy from Brighton & Hove</p> <p>Should be a development questionnaire for food growing</p> <p>Mention of management of spaces</p> <p>Allotments contribute to character and setting</p>	<p>Placemaking Plan site allocations to be reviewed to include on site requirements for green infrastructure, including provision for allotments on site.</p> <p>As above, on-site requirements to be set in the Placemaking Plan policy. In line with CIL regs, up to 5 s106 payments will also be sought for green space nearby where on-site requirements are not achievable.</p> <p>LCR5 to be updated for on-site requirement for windfall sites, to reflect green space strategy requirements.</p> <p>Noted.</p> <p>Brighton & Hove policies reviewed and additional points added.</p> <p>Reference added to Sustainable Construction checklist which will be updated to include food growing.</p> <p>To be considered as part of the B&NES Allotment Management Plan, policies support demonstration of appropriate management solutions.</p>
Sustainable Transport		
General	<p>Support for all policies promoting sustainable travel but there should be far more emphasis of the health benefits of walking and cycling, reducing car use and air pollution and ensuring there are suitable routes and promoted for both walking and cycling.</p> <p>Support for the removal of the A37 bypasses at Whitchurch & Clutton/Temple Cloud as safeguarded routes.</p> <p>Ensure that transport infrastructure is well designed and links with the design policies are made.</p> <p>General support for the transport, access and development management policy with a few textual changes.</p> <p>Should refer to the transport strategies for Bath, Keynsham and</p>	<p>Support welcomed.</p> <p>Text amended where necessary to address points raised.</p>

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	<p>Radstock.</p> <p>Add a new policy aim: "To reduce traffic congestion and air pollution and the intrusion of vehicles in urban areas".</p>	
ST1 Promoting Sustainable Transport	<p>The Highways Agency supports this policy in full and is encouraged by the requirement to ensure that applications for development seek to reduce traffic and encourage sustainable transport modes by reducing the reliance on the private car.</p> <p>Remove 'where possible'</p> <p>The policy should be updated to include more proactive measures on reducing pollution and congestion.</p> <p>The policy includes no mention of Car Clubs or electric vehicles.</p> <p>The council should be aiming to reduce traffic pollution below EU recommended levels.</p> <p>Include a new standard alone sections walking, cycling and public transport.</p> <p>The provisions that follow are timid and unlikely to achieve significant impact and there should be greater emphasis on two related issues: one is the intrusion of traffic in suburban Bath and schools traffic.</p>	<p>Support welcomed.</p> <p>Policy amended to refer to Car Clubs or electric vehicles, reduction of traffic pollution.</p> <p>Agree to have a new section on walking and cycling.</p> <p>Intended as an overarching policy setting out high level principles/approach. Appears to be principally a traffic management issue. The Development Management policies can only be used to determine planning applications.</p>
ST2 Sustainable Transport Routes	Support for the policy approach.	Support welcomed.
ST3 Transport infrastructure	Support for the policy approach and Historic England strongly endorses the commitments to a high quality design approach to any required infrastructure.	Support welcomed.
ST4 Rail freight facility	Strong support for maintaining the rail freight yard may provide options in future to reduce the volume of delivery vehicles travelling into and through Bath.	<p>Support welcomed.</p> <p>Noted. But no evidence of pressure to safeguard other such facilities in other parts of the District.</p>

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	Protect other Railfreight facilities in the district.	
Rail Station at Saltford	Network Rail aware of a local aspiration to reopen the station at Saltford but not aware of BANES approaching Network Rail with any detailed plans for reopening the station, or requesting for us to undertake any work on this.	Noted. The text has been updated to reflect the latest position regarding a rail station at Saltford.
ST5 Managing Traffic	<p>Policy ignores the fact that, in Bath at least, the main shopping streets are mixed up with residential accommodation.</p> <p>The scheme should also improve public realm.</p> <p>ST5 include "take the opportunity to drive down levels of pollution".</p>	<p>Noted but the policy seeks to discourage through traffic and other <u>unnecessary</u> motorised vehicles.</p> <p>Changes made to address public realm issue.</p> <p>Agree and policy amended accordingly. To make reference to improving air quality.</p>
ST6 Park & Ride	<p>Highways Agency supports emerging policy approach ST7 which states that development should make provision for any improvements to the transport system required to render the development proposal acceptable.</p> <p>Natural England endorses the approach of emerging policy ST6.</p> <p>Support the council in expanding Park & Ride facilities as it will alleviate congestion and pollution in the centre of town</p> <p>Believe a better form of wording for ST6 would be "minimal" rather than "no unacceptable".</p> <p>Historic England requests that an explicit reference to heritage assets and their setting is included in the policy.</p>	<p>Support welcomed.</p> <p>Disagree. Determining the level of what is and 'unacceptable' environmental assets and amenity will be part of the planning balance and will depend on the scale and nature of the proposal and other material considerations. However, policy amended to make explicit reference to the World Heritage Site and its setting.</p>
ST7 Transport, access and development management	<p>Historic England is concerned that the policy currently fails to include explicit criteria to safeguard the district's historic environment.</p> <p>Development should not be approved that results in harm to the significance of the historic environment, unless appropriate mitigation can be achieved. All highway infrastructure will be required to comply</p>	Agree. ST7 and ST3 amended accordingly to reflect these points.

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	with national guidance and standards set out in Manual for Streets, Manual for Streets 2 - wider application of the principles, the Design Manual for Roads and Bridges and any subsequent updates to these documents.	
Parking Standards	Transition Bath queries why is there no opportunity to comment on parking standards.	Disagree. This section sets out options for the proposed approach for parking standards across the District.
Sustainable Construction & Renewable Energy		
SCR1 Energy Efficiency in Existing Dwellings	<p>Support the Principle but consider it unworkable in planning terms as this level of detailed information is not typically provided at present</p> <p>Add reference to existing SPD and Guidance for Traditional Buildings on this issue</p> <p>Energy efficiency of new dwellings – possibly due to the implications of the Housing Standards Review (but there are concerns of overheating and inadequate solar shading).</p> <p>Support and hope that there will be a national policy position which will support/require this nationally</p>	This policy has been deleted in light of the implementation of the Housing Standards Review, energy efficiency issues in existing buildings are under the responsibility of Building Regulations not Planning Policy.
SCR2 Energy Efficiency in non-domestic dwellings	<p>This policy is not in line with the Government's recent policy position</p> <p>Broadly supports this policy, considers BREEAM is a standard which can be utilised whereas DEC A would be difficult to use</p> <p>the Council setting higher standards in addition to this for its own buildings – such as schools</p> <p>Policy approach should also include substantial extensions to existing buildings</p> <p>DEC A requirement would need post-occupancy evaluation and soft landings</p> <p>Would support a partnership approach with community led renewables</p>	Despite some support, it is proposed that this policy is deleted as there is still insufficient evidence in relation to technical ability to meet this and an absence of viability information. A generally supporting policy was considered, however, this issue is already covered in the Sustainable Construction & Retrofitting SPD so this would add little to the Council's stated policy position. Informal correspondence with DECC has confirmed that the non-domestic zero carbon requirement will not be upheld.

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Plan ref in Options document	Key issue	Response
	having a role.	
SCR3 Allowable Solutions	<p>Support but consider further guidance is needed re third party delivery</p> <p>Strongly support local angle, but would hope zero carbon requirements can be met on site</p>	<p>Allowable Solutions were part of the zero carbon homes requirement for 2016; this is no longer being pursued by the government. In light of this, national policy change (as confirmed in the Productivity Plan, 2015), this policy is proposed to be deleted.</p>
SCR4 On site renewable energy requirement	<p>This policy will need to be re-considered following the outcome of the national Housing Standards Review</p> <p>Should specify that this is in line with heritage, landscape and townscape considerations</p> <p>The University supports this policy approach</p> <p>Support but consider 20% might be difficult to justify and deliver.</p> <p>Consider this should be met by a combination of energy efficiency and renewable energy measures, not just the latter. Consider this could prove a viability issue and a barrier to the delivery of development.</p> <p>Note that the Core Strategy Inspector deleted this policy and said this could not be a requirement in planning policies</p> <p>Do not consider in line with national policy – requirements to be met via building regulations</p> <p>Would support a partnership approach with community led renewables having a role.</p>	<p>Minor wording amendment included in response to the comments from Historic England – in addition at only a low 10% there is flexibility, to consider which parts of a site this will be appropriate. In addition, different technologies can be employed – district heating, solar PV, ground/air source heat etc.</p> <p>Policy amended to 10% in line with Regen SW evidence base, additional costs included in the viability assessment for sites.</p> <p>In response to the comments from Linden Homes and Persimmon – this policy approach is in line with adjoining authorities, other Inspectors have taken a different view on similar policies, which have been retained. The Core Strategy Inspector's decision pre-dated a significant Ministerial Statement from Oliver Letwin which clarified the position that on-site renewable energy targets can be included in Local Plans. Specific reference to third party delivery has been removed as this is currently relatively untested, however, the policy does not preclude this approach.</p>
SCR5 Roof Mounted Solar PV	<p>Add reference to Conservation Areas and WHS.</p> <p>Broadly support - Do not support the photo used to illustrate as good practice.</p> <p>Include reference to SPD</p> <p>Strongly support – the aesthetics of solar PV are also important - suggest a reference to building integrated PV</p>	<p>Reference to the need to balance with heritage impact now included.</p> <p>This photo is illustrative; it is not cited as good practice or referred to in the policy.</p> <p>Reference to the SPD has been added. The policy has been broadened to include building integrated PV and to be wider than just domestic as the same principles apply.</p>

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Plan ref in Options document	Key issue	Response
SCR6 Ground Mounted Solar Arrays	<p>Support the approach outlined</p> <p>Support the approach in relation to site selection – but consider most appropriate siting on brownfield land and roof mounted.</p> <p>Supports, but considers sites should be allocated for solar PV fields around Keynsham</p>	Given the significant additional evidence needed to allocate sites this approach has not been pursued – further work by the development industry would be undertaken to allocate sites. In relation to community renewables, grant funding is currently available to support technical work for renewable energy.
SCR7 Community Renewables	<p>Support</p> <p>Woodland Trust would like to see the role of woodlands mentioned more specifically</p>	The policy is technologically neutral so no change is proposed to refer specifically to biomass.
SCR8 Water Efficiency	<p>Should specify whether this requires specific design at early stage if it does require this</p> <p>The Council will need to consider in light of the final national position in relation to the Housing Standards Review</p> <p>Continued support for higher water efficiency standards</p> <p>Supports and is already compliant with the water efficiency standards for non-domestic.</p> <p>Should the rainwater harvesting be required or encouraged</p>	<p>The draft policy is in line with the latest national policy and guidance; it does not require any early stage design (except for viability considerations).</p> <p>This is a very low cost measure and it is considered appropriate to require this measure rather than encourage (the latter would ensure only limited take up).</p>
Sustainable Drainage Systems		
SU1 SuDS	<p>SuDS evidence base to take account of historic infrastructure.</p> <p>General agreement, if SuDS to be delivered through planning then recommend WoE to become SPD.</p> <p>Placemaking plan to link SuDS policy with Flood Risk Management & Green Infrastructure</p> <p>Specific mention of trees and woodland as a SuDS</p> <p>Recognise potential for harm to the historic environment (archaeology) from SuDS</p>	<p>More detail is needed on the meaning of this comment. SuDS can work for brownfield developments where existing infrastructure is in place. Planning lead response to SuDS now confirmed by Government.</p> <p>Our Placemaking plan has a higher weighting than an SPD and will be used to give the WoE guide weighting at planning equal at least to that of an SPD.</p> <p>The importance of SuDS to deliver benefits beyond Flood Risk Management is recognised, consideration is to be given to identifying</p>

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	<p>Requirement for drainage strategy does not accord with CLG's requirements</p> <p>SuDS should only be for developments of 10 or more homes / commercial schemes</p> <p>SuDS policy of upstream authorities important to the flood risk of Bath</p> <p>Excessive detail, too complex and prescriptive</p> <p>Too negative in approach where 15 criteria need to be satisfied</p> <p>Policy not needed in light of WoE Guidance</p> <p>Better to have BANES chapter in WoE Guide</p>	<p>and cross linking additional relevant policies.</p> <p>We will retain the useful information provided and disseminate where we feel appropriate. Consideration to be given to including trees/woodland as a SuDS element to be given for future revisions of the WoE Guide.</p> <p>SuDS should promote surface based drainage features which would reduce excavation and hence harm to historic environment.</p> <p>Usual protections to historic environment would still apply</p> <p>SuDS policy will apply to all major development and minor development with surface water implications in areas at risk of surface water flooding; this is in line with CLG Requirement.</p> <p>See above comment, minor development of less than 10 properties may also require SuDS if located in an area at risk of surface water flooding.</p> <p>Agreed but outside scope of our Placemaking Plan. SuDS are now a national requirement for all major development (unless proven to not be appropriate) so upstream authorities should also be implementing similar policy's.</p> <p>Noted – policy to be simplified with guidance and standards contained in the WoE guidance document.</p> <p>Criteria / standards used are based on the Technical Standards created by central government, appropriateness of SuDS techniques to be assessed on a site by site basis.</p> <p>Policy to be simplified with guidance and standards contained in the WoE guidance document</p> <p>BANES chapter in WoE Guide is being prepared.</p> <p>Policy reworded to confirm application, technical standards referenced.</p>

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Plan ref in Options document	Key issue	Response
Pollution, contamination and safety		
PCS1 Pollution and nuisance	Environment Agency supports the Council's intention of continuing to implement a precautionary approach and include a policy to ensure development is not at risk from, or does not contribute to unacceptable levels of pollution.	Support welcomed.
PCS3 Air quality	Natural England supports the policy approach Policy is weak and makes no attempt to reduce pollution to acceptable levels for good health; the policy seems to promote maintaining the status quo	Support welcomed. Noted but the PMP can only include policies for considering planning applications and needs to be realistic in its expectations. Policy considered consistent with NPPF.
PCS5 Contamination	Environment Agency supports the policy approach	Support welcomed.
PCS6 Unstable land	<u>The Coal Authority</u> supports the policy approach	
PCS7 Water Source Protection Zones	Environment Agency supports the policy approach and would be happy for the Council to include a link to the mapping, rather than SPZs being identified on the Policies Map, provided the Council are confident it will still be given sufficient weight in planning decisions.	Support welcomed.
PCS8 Bath Hot Springs	General support for the proposed policy approach although the policy could be strengthened by spelling out the provisions of saved Local Plan Policy NE.13A	Noted. Only difference between NE.13A and PCS8 is that reference to the Protection Area as shown on the Policies Map has been removed thus broadening the scope of the policy to ensuring the impacts of development beyond the outer zone of the Avon Act are considered. This has in effect strengthened the policy.
Minerals		
Minerals Allocations	Support for safeguarding existing minerals allocations at Upper Lawn Quarry, Bath and Stoke Hill Mine, Limpley Stoke.	Support welcomed. .

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M5 Energy Minerals	<p>Welcomes proposal to employ the precautionary principle when assessing proposals for shale gas.</p> <p>The Coal Authority is seeking that the Council ensures the policy aligns with its counterpart in the Somerset Minerals Plan recently found sound and would support the inclusion of a locally distinctive policy addressing new energy technologies, such as Coal Bed Methane (CBM), Abandoned Mine Methane (AMM), and Underground Coal Gasification (UCG).</p>	<p>Support welcomed.</p> <p>The Energy Minerals policy framework (Policy M5) has been redrafted in the context of the PPG and aligned with the Somerset Minerals Plan</p>