

Chapter 2 (Bath and North-East Somerset issues, challenges and spatial priorities)

Spatial priorities for the local plan (p.19)

Q: Do you agree with the scope of the spatial priorities outlined above? (p. 21)

We partially object.

The plan should say how it will respond to local needs through more effective, active and inclusive consultation, participation and engagement through plan making and planning, decision making, strategies and delivery plans. Importantly a demonstrated commitment or evidence of this is not yet shown.

The spatial priorities must be strengthened to emphasise that Plan 'will' – cherish District's unique characteristics – heritage, natural & human. We suggest adding this third point.

We are pleased that a 6th point has been added which includes heritage assets and specific mention of the World Heritage Site.

The spatial priority to provide affordable housing is strongly supported, however it must come with a very clear definition. The term affordable is too narrow and not defined.

The spatial priority to provide affordable housing should reflect an ambition for high quality and well-integrated affordable housing.

Q: What do you think are the key elements of a sustainable and healthy place? (p. 21)

Ultimately, sustainable and healthy places must be responsive to the needs and priorities of the communities (the basic principles of Doughnut economics) that occupy them and therefore B&NES must prioritise understanding the needs of the community through more effective, active and inclusive, consultation, participation and engagement through plan making and planning, decision making, strategies and delivery plans. Importantly a demonstrated commitment or evidence of this is not yet shown.

A sustainable and healthy place must provide inclusive, affordable, safe, well connected, decarbonised settlements, with provision of employment, access to GPs and hospitals, equal access to good education via the provision of schools, further education, supported by facilities for children, and facilities for today's population without compromising prospects for future generations.

Sustainable and healthy places must be landscape led and nature positive, using resources efficiently. They must be well designed and constructed to create heart-warming and spirit lifting environments.

A sustainable place must, by definition, be healthy. A sustainable place is a place where individuals can achieve their optimum level of health and happiness/well-being without reducing the level of health and happiness/wellbeing of others. There must be equality in access to local food production, health facilities and nature.

Sustainable and healthy places must be climate resilient and adaptable to change.

Full consideration should be given to making places which genuinely enable zero-carbon living for residents, through housing utilities, car-free transport and easy access to local services and employment, whilst matching holistic carbon emissions in construction against mitigation and off-set through local ecosystem services. The aspiration should be to achieve a carbon negative place, which will enrich people's health and sense of wellbeing and social value.

Chapter 4 (Bath and North-East Somerset spatial strategy principles and location options)

Q: What do you think of the spatial strategy principles set out in this chapter and their relative importance? Is there anything else you think we should include? Please give reasons for your answer. (p. 45).

Section 4 (4.4) should specifically refer to the impact on the landscape setting of the World Heritage Site and the consideration of cumulative harm

Green belt assessments, along with assessments of the suitability of green belt sites in the HELAA also need to take account of the potential for cumulative harm to the setting of the -City of Bath World Heritage Site.

Q: What role should different sub-areas play in accommodating new development and supporting infrastructure?

Q: What approach to distributing development across B&NES should be followed?

Chapter 5 (Bath and its Environs)

Priorities and objectives (para. 5.12, p. 57)

Q: Do you agree with the key issues, priorities and objectives for Bath? Please give reasons for your answer (p. 59)

We partially agree/support.

We generally agree with order and content.,

More could be said about the city's relationship to its river.

Ambitions for a landscape city and a positive strategy should be supported, not only by a green infrastructure SPD but by a spatial plan master plan – such as a City of Bath vision for landscape and biodiversity.

The priority and objective to deliver affordable housing is strongly supported, however it must come with a very clear definition. The term affordable is too narrow and not defined.

The provision of low carbon affordable housing should reflect an ambition for high quality and well-integrated affordable housing. There is a need to ensure that 'right homes in the right places' also has a commitment to quality and design excellence, rather than cheap and quick developments which ultimately devalue the city.

The Conservation Area Character Assessments must be completed as an evidence base for plan making and planning, decision making, strategies and delivery plans.

Where master planning is cited as a specific placemaking policy defining the term 'comprehensive masterplan' is required. For example, the extent which the masterplan is a concept plan, framework plan, detailed parameters plan and detailed master plan. Full and detailed master planning should be a requirement for all major sites and should be specified in more detail through the Local Plan.

For all sites there needs to clarity around 'mixed-use development' and the specific mix/types of uses required for each site. Specifically uses to support major housing development and sustainable communities.

Site options (p.61)

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p.63).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

No, we partially object to this approach.

A 'landscape city' and 'well-being city' must be supported by policies that support the delivery of landscape-led, community-led development.

There is no justification for the need to consider separate land parcels on the edge of Bath. We are not convinced this is necessary.

Para 5.98. Taking the West of Bath site out of the Green Belt would need to be justified by very special circumstances, this would require showing that all reasonable alternatives have been demonstrated. We can't see that this has been done.

We do not consider that the need for housing justifies taking sites to the west of Bath out of the Green Belt.

IF there is a demonstrated need then alternative sites with individual or combined capacity to meet justified need could be considered.

We think that Table 1 p102 is wrong re Lansdown Rd - which is not a Local Centre let alone in Weston & Newbridge - the whole table is misaligned and should either be corrected or removed.

For site allocations and Design Values (p63) these need to be modified to priorities community-led design, consultation and engagement. And the BD1 Bath Design policy needs to reflect this.

Where master planning is cited as a specific placemaking policy defining the term 'comprehensive masterplan' is required. For example, the extent which the masterplan is a concept plan, framework plan, detailed parameters plan and detailed master plan. Full and detailed master planning should be a requirement for all major sites and should be specified in more detail through the Local Plan.

The Conservation Area Character Assessments must be completed as an evidence base for these Values, plan making and planning, decision making, strategies and delivery plans.

Q: Can you suggest alternatives that you think we should consider? (p.63)

Greater density on brownfield sites, mixes of residential uses in other locations such as Newbridge Riverside, the transfer of use to residential from unbuilt PBSA, windfall sites or if very special circumstances are demonstrated, smaller infill green belt sites (if justified) could meet a shortfall in the long term. which is much less than the capacity of large separate land parcels in the Green belt. However, there would need to be an assessment of the impact in terms of harm and cumulative harm to the WHS site setting.

Q: Do you have any evidence or documentation that you would like to upload, to support your answer? (p.63)

Yes. While we are unable to test the accuracy of these calculations without discussion with B&NES Council just having a very quick look at housing need numbers and the HEALA we have found that the total housing need for Bath City 2022-42 is 3,475.

The brownfield/non-green belt sites in the HELAA which could bring forward residential development total 2,006 dwellings.

The non-green belt/brownfield site Local Plan site allocations which haven't yet been built total 1,220 (omitting duplications with HELAA and sites we know to have been developed). So, any justified release of land for the Green Belt would be much less than the approx. 1,500 capacity identified to the west of Bath. And could be avoided by greater density on brownfield, the transfer of uses from PBSA, windfall sites or in very special circumstances smaller alternative green belt sites (if justified) could meet a shortfall of 249.

Milsom Quarter (para. 5.32, p. 64)

Q: Do you prefer Option A or Option B, or neither? (p.64)

Option B.

More work needs to be done to come up with a more attractive offer to encourage developers to consider the Cornmarket & Cattlemarket sites. Previous attempts at reuse of the Cornmarket have all proved economically non-viable; some pump-priming is necessary here. Likewise, the future of the Cattlemarket is tied up with the domination by the Podium car park exit and service access to Waitrose, which need studying, also in relation to the vaults underneath.

Q: Can you suggest alternatives that you think we should consider? (p. 64)

There needs to be clarity around 'mixed-use development' and the specific mix/types of uses required. Specifically uses to support major housing development and sustainable communities.

The long views of landscape are critical and the significance of the special townscape character of Milsom Street should be recognised. New trees and interventions could harm the Georgian streetscape. Consideration is needed to identify how George Street can be enhanced without the creation of visual barriers.

Other comments:

Broad Street Car Park/Yards

Redevelopment of the Broad Street car park and links to allow residential use of upper floors need more in-depth study in the Milsom Quarter.

Building on the car park needs to avoid over development of central portion and maintain shoulder height.

The principal objective here should be to lower rates and occupy vacant properties, before any carbon intensive construction is considered.

Notwithstanding the above, any design concept will need to appropriately respond to the existing scale, architecture and typology. Consideration will need to be given to how the site is accessed and have sufficient permeability including to any development on the King Edwards School site.

King Edwards School

Placemaking polices should seek to secure collaborative approaches to realise the future of this site as an anchor building in the quarter which would help to elevate commercial and social activity. Consideration will need to be given to how the site is accessed and have sufficient permeability including to any development on the King Edwards School site. .

The Local Authority MUST look to CPO the property and in public ownership there will be opportunities for funding. The Council needs a 'reserve plan' to deal with 'old King Edward's School' in the event that Samuel Smith's Brewery again fail to act within a specified amount of time.

We strongly feel that a community partnership, seeking to realise the development of the site to enable economic activity as a significant site within Milsom Quarter would add value and weight to the case for CPO. Without prejudice, Bath Preservation Trust would willingly work with B&NES Council to enable this outcome, using our Articles of Association as a Building Preservation Trust. The business case to underpin the use of the building should be viewed in consideration of the proposals for Broad Street Car Park/Yards.

Milsom Place

A business rates incentive is crucial to improving the vitality of Milsom Place and may benefit from a mix of food and drink outlets to suit a range of incomes for those living and working in the vicinity. A variety of units would bring vibrancy and become a destination.

Broad Street Place/YMCA courtyard

The space would benefit from becoming more inviting to passers-by, through appropriate enhancement. The re-opening of the rear access to retail to the retail units would improve use and surveillance.

Jolly's Department Store

BPT supports the retention of Jolly's as an anchor department store.

St Michaels Neighbourhood

Broad Street is characterful and could be a fundamental element of the Milsom Quarter. Any remodelling of the public realm should strive to minimise clutter and demonstrate consistency with the Bath Pattern Book.

Northgate Yard/Old Post Office

If the fashion museum is to be relocated here, it will secure its long-term use and a world class museum will bring associated economic benefits.

Bath Central Riverside (para. 5.33, p.64)

Q: Do you prefer Option A, B, C or none of the above? (p.65)

Option B

However, this requires a little more clarity is needed on the critical issues surrounding proposals for the Rec, especially a more specific reference to protecting a wider range of views, and more detail on potential uses for the colonnades under grand Parade and how they might connect to Parade Gardens at one end and Slippery Lane at the other. Whilst the function of the river and the retention of the floodplain storage is included, specific reference should be made to the need to identify and mitigate any flood risk.

Q: Can you suggest alternatives that you think we should consider? (p.65)

The potential for a building fronting Terrace Walk (presumably replacing the Lower assembly Rooms which were demolished in the 1930s) needs defining in more detail than appears at present, given the impact on so many important townscape views.

Manvers Street (para. 5.34, p. 65)

Q: Do you prefer Option A or Option B, or neither? (p.65)

Option B

Policy SB3 is surprisingly detailed compared to other adjoining policy areas, in particular stating that there should be a “north - south street aligned with Duke Street and an east – west street aligned with the north front of Manvers Street Baptist Chapel”, and reference to fairly precise building heights. However, there ought to be also a reference to avoiding building designs which cause the light spill - as we’ve seen at 20 Manvers Street.

Also, we struggle to see where this office space, retail and housing will go, unless there’s an assumption the Royal Mail sorting office will be replaced.

Q: Can you suggest alternatives that you think we should consider? (p.65)

No.

Bath Quays North (p.65)

Q: Do you prefer Option A or Option B, or neither? (p.66)

Option B. This will allow more flexibility and as we have seen with Option A. Since the pandemic, there may be a smaller demand for 'traditional' office space than previously, but more demand for 'hybrid' spaces such as research & development and 'clean' light industry/ start-ups.

Q: Can you suggest alternatives that you think we should consider? (p.66)

Specific provision for a policy compliant percentage of affordable housing. There needs to clarity around 'mixed-use development' and the specific mix/types of uses required Specifically uses to support major housing development and sustainable communities.

South Quays and Riverside Court (p.67)

Q: Do you prefer Option A, B, C or none of the above? (p.67)

Option B. As otherwise we might lose a valuable well-located employment area. However, the size of the existing suggestion for development adjacent to river will dwarf the Newark Works which respects the industrial past.

Suggest housing element to shift to Riverside Court with min 30% properly affordable.

Q: Can you suggest alternatives that you think we should consider? (p.67)

No.

South Bank (para. 5.40, p.68)

Q: Do you prefer Option A, B, C or none of the above? (p. 68).

Option B. However, the two present uses are valuable to have in such a central position.

Q: Can you suggest alternatives that you think we should consider? (p. 68).

Residential densification of the brownfield Travis Perkins riverside site by providing residential at upper levels above one of the storage warehouses is worthy of exploration.

Green Park Station West & Sydenham Park (p.68)

Q: Do you prefer Option A, B, C or none of the above? (p. 69).

Option B needs to include affordable housing alongside employment.

Q: Can you suggest alternatives that you think we should consider? (p. 69).

Light industrial and retail should not be completely ruled out as these uses help to create variety.

Bath Riverside (p.70)

Q: Do you support this approach? (p. 70).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make.

Q: Can you suggest alternatives that you think we should consider?

Bath Press (p. 70)

Q: Do you support this approach? (p. 70).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make.

The policy must come with a specific provision for affordable housing on site. There needs to be greater clarity around 'mixed-use development' and the specific mix/types of uses required. Specifically uses to support major housing development and sustainable communities.

Q: Can you suggest alternatives that you think we should consider?

Roseberry Place (p.70)

Q: Do you prefer Option A, B, C or none of the above? (p. 71).

Option C. So that more key worker housing can make up for the potential loss of affordable house on Bath Press and Homebase sites.

Q: Can you suggest alternatives that you think we should consider? (p. 71).

This site is potentially an ideal location to have to have start-up and research uses with housing.

Westmark Site, Windsor Bridge Road (p. 71)

Q: Do you support this approach? (p.71)

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make.

Policy should be specific about the building heights on this site - which should be determined by the Conservation area context, not the heights on the opposite side of the river.

Q: Can you suggest alternatives that you think we should consider?

Stable Yard industrial Estate (p.71)

Q: Do you support this approach? (p.71)

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make.

The approach to protect the site from development and retain the existing industrial uses, and protect employment is supported.

Q: Can you suggest alternatives that you think we should consider?

Newbridge Riverside (p.72)

Q: Do you prefer Option A or Option B, or neither? (p. 73).

Option B. As to widen range and size of users. A clearly defined landscape and ecological frame work is supported and encouraged.

Q: Can you suggest alternatives that you think we should consider? (p. 73).

There are patches of (mainly Victorian) residential development in parts of the site already, so we don't see why small imaginative housing developments should be excluded? (cf. East London). This will help meet housing need within the city and potentially reduce the need to travel to work.

Weston Island (p.74)

Q: Do you prefer Option A or Option B, or neither? (p. 75).

Option B. To help create and support different activities in Bath and help to create a creative area.
Option B maximises options if pure industrial use doesn't attract offers.

Q: Can you suggest alternatives that you think we should consider? (p. 75).

No.

Twerton Park (p.75)

Q: Do you support this approach? (p.75).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make.

Policy should be amended to include specific provision for high quality affordable housing provided on site.

Q: Can you suggest alternatives that you think we should consider?

Royal United Hospital (RUH), Weston (p.75)

Q: Do you support this approach? (p. 76).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make.

Broadly this approach is supported. Consideration should be given as to whether any permitted development rights associated with C3 use should be removed/restricted, though this may be beyond the scope of the policy and more suited to the development management process.

A heritage led approach to development in the “vicinity of the Manor House” [Grade II*] (policy SB18) is appropriate and would also be crucial to any development of the listed building to provide accommodation (see para. 216a of the Bath Composite Plan (Vol. 2. Jan 2023). The Manor House itself is in alarmingly poor condition and must be considered a ‘building at risk’ and needs urgent investment.

Any emerging policy should include an element that addresses the Local Authority’s aim that development must ensure that B&NES is carbon neutral by 2030 and climate resilient.

Q: Can you suggest alternatives that you think we should consider?

Hartwells Garage (p.76)

Q: Do you support this approach? (p. 76)

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make.

If the development does not go ahead any new scheme should be guided by a policy that reverts the site from PBSA to housing.

Q: Can you suggest alternatives that you think we should consider?

Sion Hill (p.76)

Q: Do you support this approach? (p. 76)

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make.

Unfortunately, this approach cannot be supported as per our position on the LPPU consultation. “Around” 100 dwellings (2+ bedroom apartments are unduly optimistic, given the constraints of the existing footprint, “no encroachment into sensitive landscape areas, and lower in height than the existing buildings”.

The proposed path parallel to Winifred’s Lane is likely to be problematic, due to the existing land levels, mature tree cover, disabled access and visibility requirements. However, “options to reduce traffic flows and speeds along Winifred’s Lane to make the route safe and suitable for pedestrians and cyclists should also be investigated” is welcomed.

As proposed, the site is not deliverable. A sound policy would reduce the number dwellings to 60, disregard the parallel route within the site and pursue suitable measures for Winifred’s Lane.

The policy should specify a requirement for landscape led development which protects local townscape and landscape character.

Q: Can you suggest alternatives that you think we should consider?

St. Martins (p.77)

Q: Do you support this approach? (p. 77)

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make.

In principle the approach is supported. Policy SB25 correctly highlights the need for a detailed site-wide heritage assessment reflecting the requirements of para. 200 of the NPPF. This is vital given the heritage assets and their respective relationships, and crucial to any proposed redevelopment of Frome House.

Any emerging policy should include an element that addresses the Local Authority's aim that development must ensure that B&NES is carbon neutral by 2030 and climate resilient.

Q: Can you suggest alternatives that you think we should consider?

Sulis Down (p.77)

Q: Do you support this approach? (p. 77).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Placemaking principles should be amended to make provision for supporting uses - a mix of uses that support the community, not just housing in the next plan period. This is especially critical if there is no cap on numbers.

Placemaking principles should be amended to ensure the delivery of high-quality low carbon architectural design and layout, informed by the sites' sensitive landscape surroundings and garden city principles.

The policy should be re-worded to specify that any future development must be landscape-led and include this as a primary placemaking principle. Town and Country Planning Association 'Garden City Principles' would provide a reasonable baseline.

We do not agree that the figure of 300 dwellings should be exceeded if all the placemaking principles can be met. Development of over 300 houses on this site would erode landscape character and cause harm to the landscape setting of the World Heritage Site and setting of the Wansdyke SAM. We recommend that this is removed from the policy and the housing density reduced.

Englishcombe Lane (p.77)

Q: Do you support this approach?

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make.

Whilst it is noted that this is an existing site allocation for residential development. Given the acknowledged topographical, geotechnical, and ecological issues. It raises the question that perhaps the site is not suitable.

Notwithstanding the above, any emerging policy should specify that development must be landscape-led and include an element that addresses the Local Authority's aim that development must ensure that B&NES is carbon neutral by 2030 and climate resilient.

Q: Can you suggest alternatives that you think we should consider?

Burlington Street (p.77)

Q: Do you support this approach? (p. 77).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make.

Broadly this is acceptable; however, the potential inclusion of student accommodation has not been justified. The SHMA “assumes that the expected modest growth in the student population...will be accommodated in the planned growth of mainly on-campus new student accommodation” (para. 45, BANES Composite Plan (Vol. 1. Jan 2023).

We recommend that PBSA is omitted and replaced with mix tenure housing to meet local need.

The requirement for a planning brief/design framework should be specified in policy.

Q: Can you suggest alternatives that you think we should consider?

University of Bath (p.78)

Q: Do you support this approach? (p. 78).

Yes. However, the trade-off between parking and further halls of residence is going to be a significant challenge given current capacity!

Q: Please say why, and add any extra comments about this policy that you would like to make.

Q: Can you suggest alternatives that you think we should consider?

Sulis Club (p.78)

Q: Do you have any comments on this? (p. 78)

Yes.

Q: Please say why, and add any extra comments about this policy that you would like to make.

Option A. Suggest a rewording . . . *judged against national planning policy within the NPPF and the Levelling Up and Regeneration Act 2023*, . . .

Not only is World Heritage listed in this but also AONBs. This from a Cotswold AONB objection to Sulis Down:

“At the time of writing our previous responses and at the time when this application was first considered by Planning Committee in November 2023, the LPA had a statutory duty under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape. This statutory duty has now been superseded by Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 which came into effect on 26 December 2023. This has introduced a new statutory duty on LPAs to seek to further the statutory purposes of the National Landscape as opposed to merely having regard to them.”

Q: Can you suggest alternatives that you think we should consider?

Bath Spa University at Newton Park (p. 79)

Q: Do you support this approach? (p.79).

Yes.

Q: Do you have any comments on this approach?

Yes. Broadly the approach is supported; however, any updated policy should suitably reflect the importance of ensuring that development “does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport)” as per para. 89 of the NPPF.

West of Bath (p.79)

Q: Do you consider that development in this area could provide substantial public benefits that might outweigh the substantial harm to the World Heritage Site? If so, what are these public benefits? (p. 81).

No. It is not evident that development in this area would provide any substantial public benefits that would deliver economic, social or environmental objectives that outweigh the great weight afforded to the conservation of the WHS as a designated heritage asset. The NPPF is explicit in that substantial harm to a WHS “should be wholly exceptional” (para. 206).

Q: Do you consider that these public benefits also demonstrate ‘exceptional circumstances’ that justify removal from the Green Belt? Please explain why and what ‘reasonable alternatives’ should be considered (p. 81).

No. The release of land from the green belt is not justified and no exceptional circumstances have been demonstrated.

Q: Are there specific sites or areas in the west of Bath location that you think should be considered? (p. 81).

No.

South of Burnett, adjacent to the A39 (p. 82)

Q: Do you think we should explore the potential for longer-term development in this location?
Please explain your reasons (p. 83).

No, not in this Local Plan period. However, during the period, it would be advisable to undertake comprehensive community engagement, research on the impacts and full consideration of how the development of any new community could be implemented sustainably, without introducing greater car reliance, whilst providing social integration and community facilities.

Chapter 8 (Rural areas: vision, strategy and options)

Village options (p.216)

Q: Do you agree with this approach to potential development locations in rural areas? Do you think we should aim to concentrate new development in the most sustainable villages, or spread it across all identified villages? Please give reasons for your answer (p. 221).

Rural locations should be sustainable accessible locations to strengthen community facilities and public transport opportunities. There is a need to consider 'almost there' settlements which are capable of becoming more sustainable.

Q: Is our assessment of these priority areas appropriate and effective? Is there anything else you think we should consider? Please give reasons for your answer (p. 221).

No comment. Seems reasonable.

Q: Can you suggest other ideas that we might consider?

Chapter 9 (Development management policy options)

Policy H/AH: affordable housing (large sites) (para. 9.8, p.224)

Q: Do you agree with this approach? (p. 225).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Can you suggest alternatives that you think we should consider?

Policy H/AH: first homes (large sites) (p.226)

Q: Do you agree with this approach? (p. 226).

Yes. Providing the discount is in perpetuity to future qualifiers.

Q: Do you agree with this approach? If you consider that an essential worker exceptions housing policy should be included in the Draft Local Plan what factors should be covered within the policy? (p. 226).

Partially. This is difficult to police and compliance check. Discount must be in perpetuity to future qualifiers. Any right to buy must ensure employer/ landowner gets first refusal.

Q: Do you consider that any such Local Plan policy should use the NPPF definition of essential workers and if not, what changes should be made? (p. 226).

Yes.

Q: Can you suggest other ideas we should consider?

Policy H/AH: affordable housing (small sites) (para. 917, p.227)

Q: Do you prefer option A or B? Please explain the reasoning (p. 229).

Option A, given proportionality.

Q: Can you suggest alternatives that you think we should consider?

Policy H/AH: affordable housing (viability) (para.9.21, p.230)

Q: Do you prefer option A or B? Please explain reasoning (p. 233).

Option B as this seems more front loaded.

Q: Can you suggest alternatives that you think we should consider?

Policy H/RS: affordable housing regeneration schemes (para.9.28, p.234)

Q: Do you prefer Option A or Option B? Please explain reasoning (p. 235).

Option B to ensure it is deliverable. However, viability is always a material consideration! Not sure these two options. No net loss of social housing should be encouraged as this has become the result of many so-called regeneration schemes.

The words “subject to social balance” could have serious equal opportunities issues. Is there a defined ratio of poor people to rich people? These ‘considerations’ require approaching in a more sensitive and qualified manner.

Q: Can you suggest alternatives that you think we should consider?

Policy H/RES: first homes exception sites (p.240)

Q: Do you prefer Option A or Option B? (p. 242)

Option A as this would require 25% allocation of affordable housing as First Homes.

Q: If you would like to see a criteria-based policy, what factors do you think the criteria should cover? (p. 242)

Policy H/RES: community led development exceptions sites (para.9.43, p.243)

Q: Do you prefer Option A or Option B? (p. 243).

Option B

In general, we support community led development.

Q: If you would like to see a criteria-based policy, what factors do you think the criteria should cover? (p. 243).

No comment.

Policy H/SH: specialist housing and homes for older people design (para.9.47, p. 244)

Q: Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options (p. 246).

Option C. Integration valuable to OAPs and community generally. This helps create balanced and cohesive communities.

Policy H/EC: affordable housing requirements within older person and specialist housing (including extra care) (para.9.56, p.247)

Q: Do you support this approach? (p.248).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Policy H/AS: accessible homes (para.9.62, p.249)

Q: Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options (p. 251).

Option A. This is the simplest.

Q: Can you suggest alternatives that you think we should consider?

Policy H/AS: Residential Space Standards (para.9.66, p.252)

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 253).

Neither. NDSS should apply to all housing, except for specific short-term rentals.

Q: Can you suggest alternatives that you think we should consider?

Policy H/AS: residential space standards in market housing (para.9.70, p.254)

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 254).

Neither. NDSS should apply to all housing, except for specific short-term rentals, providing more space for health and wellbeing.

Policy: H/HM: Housing Mix (para.9.75, p.255)

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 256).

Option B given it is evidence based.

Q: Can you suggest alternatives that you think we should consider?

Policy H/BtR: Build to Rent Developments – Location of BtR Schemes (para.9.77, p.257)

Q: Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options (p. 258).

Not sure. But there needs to be a policy mechanism to preclude great wedges of monocultural BtR development, rented at highly inflated prices as per Lower Bristol Rd.

A Council position and policy for rent controls?

Q: Can you suggest alternatives that you think we should consider?

Policy H/BtR: Build to Rent Developments – Affordable Private Rent Discount Level (para.9.79, p. 258)

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 259).

Option A

Q: Can you suggest alternatives that you think we should consider?

Policy H/BtR: Build to Rent Developments – Affordable Private Rent homes required in each development (p.260)

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 261).

Undecided. Both options require more evidence in support.

Q: Can you suggest alternatives that you think we should consider?

Policy H/CL: Co-living Schemes – Location and Provision (para.9.89, p.262)

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 263).

Option B has greater flexibility. Also allows for rural cooperative farming/mansion shares.

Q: Can you suggest alternatives that you think we should consider?

Policy H/CL: Co-living Schemes – Affordable Housing Provision (p.264)

Q: Do you agree with this approach? (p. 264).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make?

Option A, should help bring this forward.

Q: Can you suggest alternatives that you think we should consider?

Policy H/CL: Co-living Schemes – Amenity Standards (p.265)

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 265).

Option A has greater flexibility – but requires relinquishment of tick box approach.

Q: Can you suggest alternatives that you think we should consider?

Policy H/PBSA: Purpose Built Student Accommodation - Provision and Location (p.266)

Q: Do you prefer Option A, Option B or Option C? (p. 268).

Option A.

Q; Please explain the reasons for your opinion on these options?

Restrict PBSA.

Q: Can you suggest alternatives that you think we should consider?

Policy H/PBSA: Purpose Built Student Accommodation - Affordable Housing or Rent (p.268)

Q: Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options (p. 271).

Option C but all options difficult to manage.

Q: Can you suggest alternatives that you think we should consider?

Policy H/SBCHB: Self and Custom Housebuilding (para.9.116, p.271)

Q: Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options (p. 274).

Whatever it takes to increase availability of sites.

Q: Which of the Options A to C do you think would best meet the Local Plan priority of providing homes that are affordable?

Q: Can you suggest other ideas we should consider?

Policy H/GT: Gypsies, Roma, Travellers and Travelling Show People (p.274)

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 276).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

The approach seems reasonable.

Q: Can you suggest alternatives that you think we should consider?

Policy H/M: Moorings (p.276)

Q: What is your opinion of this approach, and why? (p. 277).

Seems reasonable.

Q: What is your opinion of this approach, and why? What criteria should we consider? (p. 277).

Q: Can you suggest other ideas we should consider?

Policy C/RD: Sustainable Construction for New Residential Development (p.279)

Q: Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options (p. 282).

Option C. This has the advantage that if **all future** electricity is provided by 'green' sources, the need for trying to design in PV panels may become redundant or less pressing (other than for diversity/security). This places less pressure on sources of rare elements for widespread PV panel usage.

Consideration should be given to including a 'no overheating requirement'. Para. 158 of the NPPF states "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account...the risk of overheating from rising temperatures". The omission of this requirement may prove the policy unsound.

In addition. Sustainable construction needs to be supported by a policy provision for

A. A retrofit first approach.

B. A requirement for sustainable/adaptable/convertible building structures and formats.

Q: Can you suggest alternatives that you think we should consider?

Policy C/NRB: Sustainable Construction for New Non-Residential Development (p.283)

Q: Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options (p. 285).

Option B. This has the advantage that it will remain our local target and leaves flexibility in design about **how** that target is achieved.

Consideration should be given to including a 'no overheating requirement'. Para. 158 of the NPPF states "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account...the risk of overheating from rising temperatures". The omission of this requirement may prove the policy unsound.

Nowhere mentions the sustainable/reusable plan format. This is key to sustainable construction. It's not just about thermal performance.

Q: Can you suggest alternatives that you think we should consider?

Policy C/EC: Embodied Carbon (p.286)

Q: Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options (p. 288).

Option C as this maximises the opportunities to reuse existing fabric, but also then apply Option B to set the standard of the alterations and additions to encourage use of low-carbon materials.

There should be a retrofit first approach to all redevelopment proposals.

Q: Can you suggest alternatives that you think we should consider?

Policy C/RE: Renewable Energy Target (p.288)

Q: Do you support this approach and why? (p. 291).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Generally, yes as need to be as strict as is reasonable to begin to address problem. While also being flexible. It may require a guarantee to developers and investors that the agreed target at the time of planning will remain in force even if circumstances change, to avoid them getting 'cold feet'.

Q: Can you suggest alternatives that you think we should consider?

Policy: C/RE: Renewable Energy Approach (p.292)

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 293).

Why either/or? Options are not incompatible. In option B – safeguarding requires ‘meanwhile uses’ until ready – perhaps ‘identifying’ rather than ‘safeguarding’.

Q: Can you suggest alternatives that you think we should consider?

Policy N/SHS: Sites, Habitats and Species (p.294)

Q: Do you agree with this approach and why? (p. 295).

Yes, seems sensible/clear.

Q: Are there any approaches which can be taken to ensure the policy can better reflect the Council's corporate priorities? (p. 295).

9.181 should include:

- Enhance the biodiversity value of Green Belt land, bringing more land in to better condition, to enhance the cumulative value of this important natural resource. Green Belt enhancement will improve biodiversity, improve water storage capacity and slow water movement.

Q: Can you suggest other ideas we should consider?

Policy N/BNG: Biodiversity Net Gain (para.9.190, p.296)

Q: Which of the policy Options A to C do you prefer? Please say why (p. 299).

Option B – seems to deliver more.

Q: Would an additional policy approach be needed for influencing location of off-site gains and their proximity to point of habitat loss? (p. 299).

It would be more beneficial to inhabitants if gains were located close to home – assuming human access acceptable which may not be!

Q: Should we be seeking a minimum of no net loss and appropriate net gain for schemes exempt from mandatory BNG? (p. 299).

Yes.

Q: Do we need to define when long term management of on-site gains is required? (p. 299).

Yes.

Q: Can you suggest other ideas we should consider?

Policy N/GI: Green Infrastructure (para. 9.205, p. 300)

Q: Which of the policy Options A to C do you prefer? Please say why (p. 303).

None of above - all have shortcomings.

Q: Are there any approaches which can be taken to ensure the policy can better reflect the Council's cooperate priorities? (p. 303).

Q: Can you suggest other ideas we should consider?

Policy N/OS: Open Spaces (para.9.211, p.304)

Q: Which of the policy Options A to C do you prefer? Please say why (p. 305).

Option C. And more extensive areas belong here. But open space standards (aka NPFA, now Fields in Trust) with play areas also 'belong' in Housing.

Q: Are there any approaches which can be taken to ensure the policy can better reflect the Council's cooperate priorities? (p. 306).

Q: Can you suggest other ideas we should consider?

Policy N/TWC: Trees and Woodland Conservation (9.217, p.307)

Q: Which of the policy Options A to C do you prefer? Please say why [note that there is no option C given in the table] (p. 309)

Option B. There is no option C given in the table. Though not convinced re tree-lined streets as universal panacea. We are concerned about long term maintenance issues with street trees. Must be included in policy requirements for management plans.

Q: Are there any approaches which can be taken to ensure the policy can better reflect the Council's cooperate priorities? (p. 309).

Yes.

Ensure succession planting for mature trees.
Ensure community backs choice of species,
Ensure all new trees are cared for after planting.

Q: Can you suggest other ideas we should consider?

Policy N/CELLC: Conserving and Enhancing the Landscape and Landscape Character (p.310)

Q: Do you think it is appropriate to retain this policy, with slight amendments, to include reference to non-designated landscapes? Please give your reasons (p. 311).

Yes. As text states, this approach requires an understanding of landscape character that is valued and an understanding of the significance of landscapes and their components rather than just carrying out a crude check whether the landscape is designated or not.

Q: Do you think all of the current settlement settings and boundaries on the map are justified and effective? If not, would you change any existing settings, or identify and add new ones? Please give your reasons (p. 311).

It would be logical for the Landscape Setting of settlements to at fully cover the setting of the World Heritage Site.

Policy N/CELLC: Landscape Setting of Settlements (p.312)

Q: Do you agree that we can retain this policy without any changes? Please give your reasons (p. 312).

Yes. Agree.

Q: Can you suggest other ideas we should consider?

Policy N/ FRSD: Flood Risk Management and Sustainable Drainage (para. 9.233, p. 313)

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 315).

Option B – there is a serious and urgent need to control excessive quantities of water entering sewers and thence waterways.

Q: Can you suggest alternatives that you think we should consider?

Policy N/ES: Ecosystem Services (para.9.238, p.316)

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 317).

Option B – advantages identified in table.

Q: Can you suggest alternatives that you think we should consider?

Policy N/EN: Ecological Networks

Q: Do you support this approach and why? (p. 319)

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes - complies with national guidance and emphasises LNRS' importance.

Q: Can you suggest alternatives that you think we should consider?

Policy GB/GB: Infilling in the Green Belt (existing GB2)

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 321).

Option B – to maintain local village character.

Q: Can you suggest alternatives that you think we should consider?

Policy J/O

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 325).

Option B- to evidence inherent inadequacy.

Q: Can you suggest alternatives that you think we should consider?

Policy J/I: Strategic and Locally Significant Industrial Sites

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 327).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Can you suggest alternatives that you think we should consider?

Policy J/UI: Undesignated Industrial Sites

Q: Do you support this approach? (p. 329).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Please say why, and add any extra comments about this policy that you would like to make (p. 329).

Q: Can you suggest alternatives that you think we should consider?

Policy J/EM: Employment and Skills

Q: Do you support with this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 330).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Training benefits employer, employees and community.

Q: Can you suggest alternatives that you think we should consider?

Policy HVC/TC: Town Centre Network and Hierarchy

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 336).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes, on the whole.

BUT Lansdown Road should be deleted as Local Centre as there are shopfronts but no shops! lack of parking kills specialist shops. And live-work units (retaining frontage) have been refused; recently hopeful local shop lasted less than 12months. Too close (and too good bus services) to City centre. Fortunately within CA.

Q: Can you suggest alternatives that you think we should consider?

Policy HVC/TCD: Development within Centres

Q: Do you support this approach and why? Please say why, and add any extra comments about this policy that you would like to make (p. 339).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Generally, yes – wider diversification welcome, but would it include live-work units in ex shops?
There is no provision of day-today needs at Lansdown Rd Local Centre.

Q: Can you suggest alternatives that you think we should consider?

Policy HVC/LS: Dispersed Local Shops

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 340).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Can you suggest alternatives that you think we should consider?

Policy HVC/H: Healthy Places

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 342).

Option B. For stated advantage.

Q: Can you suggest alternatives that you think we should consider?

Policy HVC/H: Health Impact Assessments

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 343).

Option A. Separation simplifies things.

Q: Can you suggest alternatives that you think we should consider?

Policy HVC/H: Hot Food Takeaways

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 345).

Option A.

Q: Can you suggest alternatives that you think we should consider?

Policy HVC/CF Community Facilities

Q: Do you support this policy approach? Please say why, and add any extra comments about this policy that you would like to make (p. 346).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes partially. Community facilities should include communal Green spaces, allotments etc. These often have very active community roles and links.

Q: Can you suggest alternatives that you think we should consider?

Policy HVC/PS: Safeguarding Land for Primary School Use

Q: Do you support this policy approach? Please say why, and add any extra comments about this policy that you would like to make (p. 347).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Q: Can you suggest alternatives that you think we should consider?

Policy HVC/PSC Primary School Capacity

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 349).

Option B. Any journeys to school should be voluntary.

Q: Can you suggest alternatives that you think we should consider?

If there is a new development proposed where demand is existing, that the developer needs to show positive engagement with schools/early years providers to ensure provision by completion of the project.

Policy HVC/C Safeguarding Land for Cemeteries

Q: Do you prefer Option A or Option B? Please explain the reasons for your opinion on these options (p. 352).

Option B. With the proviso that appropriate meanwhile use (existing) is ensured.

Q: Can you suggest alternatives that you think we should consider?

Policy HVC/A Protecting Allotments

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 355).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes. The designation of the whole of Combe Down allotments with LCR8 is a vital step towards protecting it from redevelopment. This 130-year-old site is historic, and is within the WHS. I can give further background on this if needed.

It is a significant omission that Curo owned allotments have been left out of LCR8 policy coverage. Occupants of social housing deserve the same amount of Green Infrastructure as the rest of the population.

Q: Can you suggest alternatives that you think we should consider?

Policy HVC/B: Broadband

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 355).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes. However, Para. 9.323 of the options document states that Building Regulations Part R requires new residential properties to be connected to broadband. As policy LCR7B relates to both new residential and employment developments, it is unclear if there will be any policy provision for the latter type of development.

Q: Can you suggest alternatives that you think we should consider?

Policy HVC/LGS: Local Green Spaces

Q: Are the proposed new Local Green Spaces identified in Appendix 4 effective/ justified? (p. 358).

Yes. However, the designation of Combe Down allotments MUST be reassessed in the light of new evidence. This is an historic allotment site, with over 130 years of community use, and it is a key community facility. The site has important connections to the mining economy of this area. It is under real and imminent threat.

Q: Are there any green spaces not already nominated for Local Green Space designation which should be? (p. 358).

Yes. The workhouse burial ground at St Martins. This is a major omission. this is an acknowledged historic open space. It is covered by LCR 5 at present, but this does not give protection to the burials, or recognise the social historical importance of this site.

Q: Can you suggest other ideas we should consider?

Policy HD/EQ Environmental Quality [policy CP6] (p. 360)

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 360).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Broadly we are supportive of the approach. Though policy CP6 includes “where regeneration is required the imaginative integration of new development with the historic environment will be promoted”. It should perhaps also suitably reflect “the desirability of new development making a positive contribution to local character and distinctiveness” (para. 196 (c), the NPPF, Dec 2023).

It is vital that there are sufficient resources to deliver and review the conservation area appraisals and SPDs or the delivery of the aims of the policy may be compromised.

The policy includes the text “consideration of the preparation of a ‘local list’ to ensure non-designated assets are sustained and conserved”. If the LPA wants to ‘ensure’ this, then they should make it an imperative, via an alteration to “the preparation of a ‘local list’ to ensure non-designated assets are sustained and conserved”. If this is pursued, then we would urge the LPA to draft a policy that specifically relates to assets on the ‘local list’ and how development proposals will have to consider their conservation and enhancement.

Q: Can you suggest alternatives that you think we should consider?

Policy HD/WHSS: World Heritage Site and its setting [policy B4] (p.362).

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 362).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

In general, we are supportive of the approach as it seeks to prevent harm to the Outstanding Universal Value of the World Heritage Site; however, it lacks reference to the approach to development which would enhance the OUV “promotion of positive change” (see para: 026, ref ID: 18a-026-20190723 – Planning Practice Guidance (Historic Environment)).

Q: Can you suggest alternatives that you think we should consider?

Policy HD/HE: Historic Environment [policy HE1] – (p. 363).

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 363).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes partially. We broadly support the approach and welcome the specific proposed amendments.

With reference to 7 (a) (WHS). We would encourage that text is added that reflects the provisions of the Levelling-Up and Regeneration Act 2023 (Chapter 3, 102, 58B (1).

“The significance of the WHS and its setting is required to be preserved or enhanced” or similar, that demonstrates a new parity with other designated heritage assets.

It is crucial that there are sufficient resources to ensure that the guidance and SPDs referred to at para. 233 (Composite Plan, Vol. 1, Jan 2023) are suitably current and maintained, and an adopted SPD relating to Locally Listed Heritage Assets should also be included.

Q: Can you suggest alternatives that you think we should consider?

Policy HD/SCCW: Somersetshire Coal Canal and the Wansdyke [policy HE2] (p.365).

Q: Should we re-word Policy HE2 to also encourage development or improvements which would sustain or enhance, or better reveal, the significance of the Wansdyke or Somersetshire Coal Canal? (p.368)

Yes. Paragraph 9.360 of the options document refers to the canal as being a designated heritage asset. From a brief review of the Historic England 'listing map' ([Search the List: Map Search | Historic England](#)) it seems that certain features such as lock flights are listed; however, it is not evident that the whole navigation as per the B&NES policy map is designated.

Notwithstanding the above, if policy HE2 is to be retained it should also include suitable text that reflects the provisions of the applicable legislation and the requirements of section 16 of the NPPF (justification, balancing exercise (public benefit). Currently the policy reads as if material considerations that would apply to decision making in the case of any other designated heritage asset are not applicable.

Q: Do you agree with our proposed expansions to the Somersetshire Coal Canal route? Are the proposals indicated in the maps (Figures 66 to 70) effective and justified, in your opinion? Please give reasons for your answers (p. 368).

No comment on Radford, the 2no. Camerton sites or Dunkerton.

The Combe Hay Cemetery proposed amendment seems broadly acceptable; however, any diversion of the navigation would of course need to take into account any impact on the listed building to the south.

Q: Can you suggest other ideas we should consider?

Policy HD/GUDP: General Urban Design Principles [policy D1] (p.371)

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 371).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Policy D1 must be strengthened.

It must also include space standards for permanent living. And that any living accommodation, including that for students, must be capable of conversion to compliant permanent living standards, including light, ventilation and outdoor space.

Q: Can you suggest alternatives that you think we should consider?

Policy HD/LCD: Local Character and Distinctiveness [policy D2] (p. 372).

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 372).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

The policy does not ensure the need for high quality design in the WHS. The current process presents a significant opportunity to enshrine a high standard of design in policy, to conserve and enhance the unique character and distinctiveness of the city.

Q: Can you suggest alternatives that you think we should consider?

Policy HD/UF: Urban Fabric (policy D3) (p. 373).

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 373).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes partially. We would recommend that the policy is suitably revised to ensure that high quality design is a requirement of development proposals.

Q: Can you suggest alternatives that you think we should consider?

Policy HD/SS: Streets and Spaces [policy D4] (p. 375).

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 375).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes, partially. We believe that the introduction of trees in some locations, such as but not limited to conservation areas, needs careful consideration. The planting of trees can be detrimental to composed street-scenes and underground structures such as vaults.

Suggested text for inclusion is as follows.

Tree planting should not take place where it will detract from an historic street scene or potentially damage underground structures.

Q: Can you suggest alternatives that you think we should consider?

Policy HD/BD: Building Design [policy D5] (p. 375)

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Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 376).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes. We broadly support the approach to retain policy D5 and would welcome greater engagement with the ten characteristics of good design of the National Design Guide as proposed. Given the spatial priorities of the Local Authority, including becoming carbon neutral by 2030 and nature recovery. We would expect the emerging policy to suitably engage with Resources (efficient and resilient) and Nature (enhanced and optimised), along with the other characteristics.

Q: Can you suggest alternatives that you think we should consider?

Policy HD/A: Amenity [policy D6] (p.378).

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 378).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes. In general, we support the proposed approach as it appears that it will sufficiently cover all material aspects of amenity.

Note, though this may be covered in a separate submission, para. 9.408 of the options document refers to para. 192 of the framework, whereas, para. 193 seems to be the applicable paragraph ('agent of change').

Q: Can you suggest alternatives that you think we should consider?

Policy HD/IBD: Infill & Backland Development [policy D7] (p.379).

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 379).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes. We broadly support this sensible approach; however, perhaps it should be made clear within the policy text, that it applies to both urban and rural sites.

Q: Can you suggest alternatives that you think we should consider?

Policy HD/L: Lighting [policy D8] (p.381).

Q: Policy D8 - Do you think it is appropriate to retain this policy, with slight amendments, to address requirements for all new external and public space lighting to have minimal blue light content, and to specify a general requirement for a colour temperature requirement in ecologically sensitive areas, and within protected landscapes? Please give your reasons.

Yes, partially/Partially object. We believe that it is appropriate to retain policy D8 with the proposed amendments. But it needs to go further to include all areas across the city of Bath and rural areas. Limiting and suitably controlling light and colour temperature is beneficial in terms of nature and biodiversity, human experience, health and wellbeing, residential amenity, the natural environment and the reduction of energy use. Therefore, contributing to solutions towards the climate and ecological emergencies.

Q: Should we consider defining Environmental Zones for the district? Please give your reasons?

Yes. However, it is unclear as to what is meant by environmental zones. The term is typically used in association with air quality and emissions; however, in the context of this question perhaps it relates to lighting. Notwithstanding this, defining areas in terms of environmental protections and/or qualities is likely to be beneficial in terms of both policy making and planning decisions.

Q: Should B&NES and/or City of Bath consider applying for dark sky status?

Yes. BPT has called for dark sky status for the City of Bath World Heritage Site in its published Dark Skies Guidance.

Q: Could/should B&NES aspire to become blue light free within its care spaces? (p. 381).

Yes. We draw attention to BPT's Dark Skies campaign, lighting guidance and Dark Skies Guidance Note.

The World Heritage Site should aspire to have dark skies city status. Amendments to policy D8 in relation to blue light is in general welcomed, providing that safety and security is not compromised.

Q: Can you suggest other ideas we should consider?

Policy HD/AOSF: Advertisements & Outdoor Street Furniture [policy D9] (p.383)

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 383).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Partially object. Recommended change. In general, we are supportive of the proposed approach as it seems broadly suitable.

A-boards can be sited so that they do not impinge on pedestrian movement (public safety); however, regardless they can often contribute to cumulative street clutter with other items and features, leading to harm to visual amenity. Para. 141 of the NPPF (Dec 2023) states "Advertisements should be subject to control only in the interests of amenity and public safety, taking into account cumulative impacts".

Given this, we would suggest that policy D9 is revised to "Free standing 'A' Boards can cause obstruction to pedestrians and visual clutter, and require planning permission. 'A' boards will only be permitted where they do not impinge on pedestrian movement and visual amenity and meet the Council's detailed guidance."

(This may be covered by a separate submission; however, please note that para. 9.423 of the Options Document refers to para. 136 of the NPPF with regard to advertising. Whereas para.136 of the NPPF (Dec 2023) relates to trees. Para. 141 of the Dec 2023 appears to be relevant).

Q: Can you suggest alternatives that you think we should consider?

Policy HD/PR: Public Realm [policy D10] (p.384)

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 384).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes. We are broadly supportive of the proposed approach, and we would welcome the incorporation of the pattern book and the Public Realm and Movement Strategy. We would suggest that policy D10 includes a reference to a quality in construction. This of course should be applicable to all works, including those undertaken for or by the Local Authority.

Q: Can you suggest alternatives that you think we should consider?

Policy HD/DC: Design Codes (p.386)

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 386).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

We are in general supportive of the approach, as it is hoped that a high quality of design that is appropriate for the World Heritage Site can be secured, following a process which prioritises community-led engagement with the process.

Q: Can you suggest alternatives that you think we should consider?

Policy ST/HS Promoting Sustainable Travel and Healthy Streets (p.388)

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 389).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes. Broadly we agree with the approach.

Q: Can you suggest alternatives that you think we should consider?

Policy ST/AT Active Travel Routes (p.390).

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 390).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes. In general, we support the proposed approach as it seems to be a sensible method.

Q: Can you suggest alternatives that you think we should consider?

Policy ST/RMD Transport Requirements for Managing Development (p.391)

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 391).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes. This approach is broadly supported as it seems pragmatic.

Q: Can you suggest alternatives that you think we should consider?

Policy PCS/NV: Noise and Vibration [policy PCS2] (p.393).

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 393).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes. We are supportive of the approach as it appears to be balanced.

Q: Can you suggest alternatives that you think we should consider?

Policy PCS/AQ: Air Quality [policy PCS3] (p. 394).

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 395).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes. In general terms we are supportive of the proposed approach, as with the amendments as outlined it will provide clarity.

Q: Can you suggest alternatives that you think we should consider?

Policy PCS/BHS: Bath Hot Springs [policy PCS8] (p. 396).

Q: Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make (p. 396).

Strongly support

Partially support

Neither support or object

Partially object

Strongly object

Yes. Broadly the approach to retain policy PCS8 with amendments is supported as it appears to be appropriate. We would welcome reference to both World Heritage Site inscriptions, as the hot springs are also an attribute of the OUV of the 1987 inscription.

It is suggested that the “quality” of the spring water be defined, perhaps by adding explicit reference to the “mineral and thermal qualities”.

Q: Can you suggest alternatives that you think we should consider?

**Appendix 1 – Policies retained from Local Plan Partial Update, Placemaking Plan and Core Strategy
(from p. 415)**

Q: Do you agree that these policies should be retained? (p. 421).

Yes broadly. With reference to Policy H2 (HMOs), we are of the opinion that the policy is lacking, in that it has not referred to the impact on family areas and radius to schools. The inclusion of this would strengthen the policy.