

BANES Local Plan 2022-2042 – Options Document Consultation (BPT Working Group document: references, extracts and questions)

Sources

(Options Document.pdf) [the consultation document] -

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf>

Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update (Vol 1. District-wide Strategy and Policies – Jan 2023) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf>

Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update (Vol 2. Bath – Jan 2023) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/2.%20Bath%20Composite%20Plan%20final.pdf>

Evidence base - [Search for a strategy, plan or policy | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)

Topic papers - [Search for a strategy, plan or policy | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)

Supporting documents - [Search for a strategy, plan or policy | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)

Appendices - [Local Plan appendices | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)

Full suite of documents - [Local Plan options consultation | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)

[Note that in some instances below, text and tables have been reproduced for ease of reference; however, a full review of the relevant information in the Options Document should be undertaken for all sections].

1 (Introduction), pp. 6-9. No set questions. [Identified as being beyond the remit of the review]. (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=7>

2 (Bath and North East Somerset Issues, Challenges and Spatial Priorities), pp. 10-21. (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=11>

Para. 2.24, p. 19 (Table showing the spatial priorities of the Local Plan)

Our Local Plan will plan for development in response to local needs to create attractive, healthy and sustainable places in line with the Council's Corporate Strategy.

The Plan will:

- Create a **fairer**, more **prosperous** and **sustainable** economy
- Maximise the delivery of housing that is **affordable**

In doing so, our plans for development must:

- Enable Bath and North East Somerset to become **carbon neutral by 2030** and deliver a climate resilient district
- Protect and enhance nature through facilitating **nature recovery**
- Improve **health and well-being** outcomes for all, including through planning health promoting and inclusive places and providing for cultural enrichment
- Reduce the need to travel unsustainably and enable **improved connectivity** for all through sustainable modes of transport and facilitating locally available services and facilities
- Respect, conserve and enhance our **heritage assets** and their landscape settings, in particular the World Heritage Site of Bath and National Landscapes
- Align the timely provision of **transport, health, education, social, cultural and green infrastructure** with development

Question: 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.

Question: 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, equal access to good education, 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.

3 Key Requirements in Bath and North East Somerset (pp. 22-35). No set questions. [Identified as being beyond the remit of the review] (link: <https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=23>)

4 Bath and North East Somerset Spatial Strategy Principles and Location Options (pp. 36-53). [Identified as being beyond the remit of the review] (link: <https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=37>)

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.

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.

5 Bath and its Environs (pp. 54-84) (link: <https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=55>)

[Priorities and objectives]

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

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.

[Site options]

Can you suggest alternatives that you think we should consider?

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.

Question: 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 HELAA 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.

[Sub-section] Site Allocations (pp. 63-84) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=64>

Milsom Quarter (p. 64)

[Bath Composite Plan \(bathnes.gov.uk\)](#) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/2.%20Bath%20Composite%20Plan%20final.pdf#page=43> = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [Cattlemarket for reference].

Options:

- Option A: No change proposed to the existing policy covering the Cattlemarket site.
- Option B: Introduce other policies or site allocations such as for Broad Street Yard (p. 64).

Question: 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.

Question: 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 policies 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.

See comments above regarding links. 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 (pp. 64-65) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=65>

Bath Composite Plan (bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

Options:

- Option A: Retain the site allocation policy (Policy SB2) as currently worded.
- Option B: Review and amend the current Policy SB2 wording to provide greater clarity on or to change the development requirements and design principles.
- Option C: Delete the Policy SB2 reference to this site being appropriate for a new stadium (p. 65).

Question: 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.

Question: 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 (p. 65) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=66>

Bath Composite Plan (bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

Options

- [A] Retain existing policy requirements
- [B] Update policy requirements to provide more flexibility in terms of the office space requirements by enabling a wider range of hybrid business space to suit start-up business and research & development space to be delivered (p. 65).

Question: 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.

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

No

Bath Quays North (pp. 65-66) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=66>

Bath Composite Plan (bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.37 Two options in respect of this site are presented below:

- Option A: Retain the existing land use mix (primarily office space, Class E(g)(i)) and review and amend the current policy wording to provide greater clarity on or to change the development requirements and design principles.
- Option B: Whilst ensuring this site continues to play a key role in the future economy of the city provide a greater degree of flexibility in terms of the land use mix required by policy. This could allow a change in the requirement to provide a 'minimum of 20,000 sqm of office floorspace' (Class E (g)(i)) and slightly broaden this scope to allow a wider range of hybrid business space to enable start up business and research & development space (E(g)(ii) to be delivered. Continue to allow a residential element and continue to exclude student accommodation/PBSA.
- Note: Evidence from the Future Economic Needs Assessment and Office and Industrial Market Review recommends around 47,500 sqm of additional office and research and development floorspace should be delivered in the city throughout the plan period (in addition to that committed). To allow a reduction in this important location would add pressure on other scarce sites to meet this need. The existing policy states that 'redevelopment of this site is the Council's flagship regeneration project; it will be an area that will be transformed into the city's main business location and will help to redefine the city's economic profile.' Changing the site allocation approach should not undermine this objective (p. 66).

Question: 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.

Question: 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) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=68>

[Bath Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=69) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

Options:

- [A] Review and amend the current policy wording to provide greater clarity on or to change the development requirements and design principles.
- [B] Allow more flexibility in relation to the delivery of the residential element within the existing allocation, allowing the consented floorspace in the South Quays site to change to an employment use. Housing not provided on this site would then need to be delivered elsewhere.
- [C] The current policy for Riverside Court states: 'The redevelopment of Riverside Court should retain as a minimum the existing levels of employment floorspace and be complemented by residential development that contributes towards the city's housing requirements.' Should this policy wording for Riverside Court:

o remain as it is;

o be amended to provide more flexibility in terms of land use mix; or

o be strengthened to require more employment floorspace to be delivered? (p.67).

Question: 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.

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

No

South Bank (p. 68) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=69>)

[Bath Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=69) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

Options

- Review and amend the current policy wording to provide greater clarity on or to change the development requirements and design principles.
- The current policy for South Bank requires the total development to deliver a minimum of 5,000 sq.m. (GIA) of office floorspace, and a minimum of 100 dwellings. If the two parts of the site are to be delivered at separate times, then each part is

expected to deliver an approximately even mix of uses. Purpose built student accommodation in this area is not acceptable as this would impede the delivery of other Council objectives. Should this policy:

- o Option A: remain as it is;
- o Option B: be amended to provide more flexibility in terms of land use mix; or
- o Option C: be strengthened to require more employment or more residential floorspace to be delivered? (p. 68)

Question: 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.

Question: 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 and Sydenham Park (pp. 68-69) (link: [Local Plan 2022 – 2042 - Options Document \(bathnes.gov.uk\)](#))

[Bath Composite Plan \(bathnes.gov.uk\)](#) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

Options

- Option A: Generally maintain current policy wording and update to better reflect the climate and ecological emergencies and review the alignment of the sustainable transport route through the site, if required.
- Option B: Review the proposed land uses on the site to reflect the evidence base and ensure that housing that is more affordable is delivered, that existing employment floorspace is protected and additional floorspace delivered.
- Option C: Create separate site allocations for each development parcel (p. 69).

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

Option B needs to include affordable housing alongside employment.

Question: 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) (link: <https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=71>)

[Bath Composite Plan \(bathnes.gov.uk\)](https://www.bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.45 This large and important site has been delivering new homes for the city for the past fifteen years. It comprises of a number of different land parcels, and development on these parcels has largely either been completed, has the benefit of consent, or is subject to a current planning application. Changes were made to the existing policy wording to reflect the climate and ecological emergencies as part of the LPPU and there is considered to be little justification for any further changes at this stage.

5.46 It is proposed to devise a separate site allocation policy for the Westmark Site (see below) [[Bath Composite Plan \(bathnes.gov.uk\)](https://www.bathnes.gov.uk)] = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.47 No change proposed to the existing policy. (p. 70).

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

Yes, the approach is supported.

Bath Press (p. 70) (link: [Local Plan 2022 – 2042 - Options Document \(bathnes.gov.uk\)](https://www.bathnes.gov.uk))

[Bath Composite Plan \(bathnes.gov.uk\)](https://www.bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.48 Planning permission was granted in 2015 for the demolition and redevelopment of the site to provide a residential-led mixed use development comprising 244 dwellings and approximately 1,500 sqm of flexible employment space. Since this time and apart from demolition, delivery has stalled. There has been a change in ownership of the site and a new planning application for a similar mix of uses has been submitted.

5.49 No change proposed to the existing policy. (p. 70).

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

Partially object. 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.

Roseberry Place (pp. 70-71) (link: [Local Plan 2022 – 2042 - Options Document \(bathnes.gov.uk\)](https://www.bathnes.gov.uk))

[Bath Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.50 Consent granted for mixed use scheme of Build to Rent residential and office floorspace. The former has been completed, whereas the office element has not progressed despite long periods of marketing (p. 70).

Options

- Option A: No change proposed to the existing policy.
- Option B: Amend policy to allow a wider range of hybrid business space to enable start up business and research & development space to be delivered.
- Option C: Amend policy as above, but allow for mixed use development to potentially allow other forms of housing that meet identified need i.e. homes that are suitable for workers in the local economy, and not PBSA (pp.70-71).

Question: 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.

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

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

Westmark Site, Windsor Bridge Road (p. 71) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=72>

[Bath Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.51 Currently this site is part of the Bath Riverside Site Allocation Policy SB8. Given that no progress has been made on the delivery of this site and that planning applications are at an advanced stage on the remaining Bath Riverside sites, it is proposed to generate a separate site allocation for the Westmark Site.

5.52 Based on the 'Future Economic Needs Assessment and Office and Industrial Market Review' evidence base, the Victoria Park Business Centre, which forms part of this site, is to be protected from development. For the remainder of the site it is proposed to require a residential led development that includes the provision of specific housing products that better meet local needs. Purpose Built Student Accommodation (PBSA) is to continue to be excluded (p. 71).

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

Yes. 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.

Stable Yard Industrial Estate (p. 71) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=72>

5.53 This is an industrial location, which is well occupied and contributes towards meeting an identified need in the city. Based on the Employment Needs Assessment evidence base, the Stable Yard site is to be protected from development. (p. 71).

[Local Plan Options Evidence Base: Employment Study | Bath and North East Somerset Council \(bathnes.gov.uk\)](#) = link to Local Plan Options Evidence Base: Employment Study.

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

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

Newbridge Riverside (pp. 72-73) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=73>

[Bath Composite Plan \(bathnes.gov.uk\)](#) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

[Bath Composite Plan \(bathnes.gov.uk\)](#) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference]. (link to the LPPU – Locksbrook Creative Industry Hub) [for reference].

Options

- Option A: Intensify the development potential of this area, in terms of capacity, and clearly define the range of industrial related uses that are appropriate for this location including industrial, advanced engineering sector (such as many of the existing anchor businesses), clean tech, health and life sciences, transport and storage, and creative industries. This option would ensure this area continues to serve as the main location for industrial space within the city. Identify those uses that would not be permitted, i.e. residential and PBSA.
- Option B: Within a clearly defined landscape and ecological framework and infrastructure plan should the site allocation have a consistent approach across the whole of the 'Newbridge Riverside' or should it be more granulated and have different approaches in different parts? This could allow a more nuanced approach tailored to the specific characteristics and potential of the different areas.

For example:

- o Locksbrook Road: comprising Horstmann, Bath Spa University, the Locksbrook Creative Industry Hub including the Fashion Collection Archive, various operations including trade counters.
- o Brassmill Lane: Mix of industrial type uses and trade counters including the Maltings trading estate, larger employers and manufacturers such as Rotork and Roper Rhodes.
- o This could include Weston Island or this could be maintained as a separate allocation (see below) (pp.72-73).

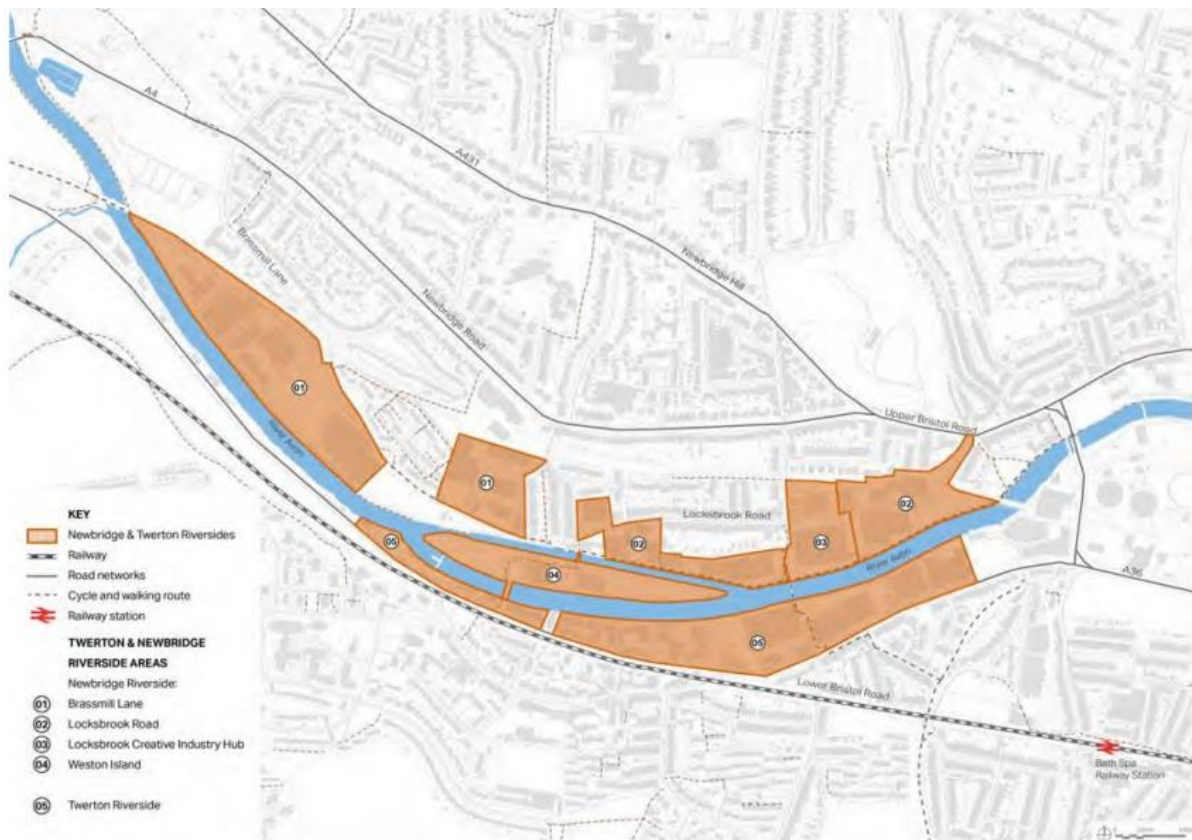


Figure 13a: Newbridge and Twerton Riverside Policy Areas

Question: 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.

Question: 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 (pp. 74-75) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=75>

Bath Composite Plan (bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

Options

- [A] This site could be protected for industrial uses in line with the Newbridge Riverside area as outlined above. This would effectively mean this site is a sub-area of a wider Newbridge Riverside allocation.
- [B] Alternatively and subject to the space requirements of particular uses, there may be potential to combine the industrial land use requirements with some or all of the, Locksbrook Creative Industry Hub and Bath Art Depot elements (p. 75).

Question: 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.

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

No.

Twerton Park (p. 75) link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=76>

Bath Composite Plan (bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.64 This policy was updated in the Local Plan Partial Update.

5.65 No change is proposed to the existing policy (p. 75).

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

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

Royal United Hospital (RUH), Weston (pp.75-76) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=76>

[Bath Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.66 The RUH have commissioned a new Estates Strategy for this site. Once this has had final sign off within the RUH Bath NHS Foundation Trust it is the intention, subject to review, to include reference to it and support its delivery, as appropriate, through the Local Plan.

5.67 There is strong evidence that the lack of availability and affordability of housing is making it difficult for some employers to attract and retain staff. Where these employers control or own land, such as the RUH, there could be opportunities to facilitate the delivery of employer linked housing that is 100% affordable.

5.68 Provided that land will not be required for healthcare or car parking during the Plan period, the council supports the provision of 100% affordable residential accommodation (Class C3) of a range of sizes and types, for use by key workers associated with the RUH.

5.69 Changes to the existing policy will be considered in the context of the new estates masterplan (pp.75-76).

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

Yes. 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.

Hartwells Garage (p.76) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=77>

[Bath Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.70 Outline planning permission for a mixed use development comprising up to 104 residential units and the provision of up to 186 student bedrooms site was granted on appeal in March 2021. Progress on delivery has been delayed but is understood to still be progressing.

5.71 No change proposed to the existing policy (p. 76) .

Question: Do you support this approach?

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

Sion Hill (p. 76) link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=77>

[Bath Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.72 Owned by Bath Spa University (BPU) and currently allocated for housing. This site was allocated in the LPPU and the policy is considered to remain fit for purpose.

5.73 No change proposed to the existing policy (p. 76).

Question: Do you support this approach?

No. 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.

St. Martins (p. 77) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=78>

[Bath Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.74 Recently introduced and allocated in the LPPU and the policy is considered to remain fit for purpose.

5.75 No change proposed to the existing policy (p. 77).

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

Yes. 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.

Sulis Down (p. 77) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=78>

[Bath Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=78) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.76 The site was removed from the Green Belt and allocated for development in the Core Strategy. The extent of the site allocation and policy requirements responded to key elements of the evidence base relating to the harm to the World Heritage Site and its setting, as well as important heritage assets such as the Wansdyke. Phase 1 of the allocation is nearing completion and there is a current planning application for the comprehensive masterplan and for phases 3 and 4. It is a very sensitive development site and given that the evidence relating to harm has not changed, it is not proposed to amend this site allocation.

5.77 No change proposed and continue to protect the field to the south of the Wansdyke and the field to the east, adjacent to Southstoke Lane (p. 77).

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

Partially 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) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=78>

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/2.%20Bath%20Composite%20Plan%20final.pdf#page=126>

= link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.78 This is an existing site allocation for residential development. There have been significant concerns from local residents about a number of issues including ecology, drainage and land slip issues. Despite this, it is considered that this site is capable of being developed for residential uses.

5.79 No change proposed to the existing policy (p. 77).

Question: Do you support this approach?

Yes partially. 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.

Burlington Street (p. 77) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=78>

[Bath Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/2.%20Bath%20Composite%20Plan%20final.pdf#page=126) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.80 This is an existing site allocation that is considered fit for purpose.

5.81 No change proposed to the existing policy (p. 77).

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

No, partially object. 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.

University of Bath (p. 78) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=79>

[Bath Composite Plan \(bathnes.gov.uk\)](#) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.82 The policy framework for the University of Bath was subject to significant review as part of the Local Plan Partial Update. It was informed by a new Masterplan that provided a vision of the future for the Claverton Campus, enabling the delivery of the development and infrastructure required to address the needs and expectations of its students and staff, and to facilitate the University's sustainable growth in a manner that also enhances the unique beauty and environmental quality of the campus.

5.83 Whilst the existing policy is robust there could be the possibility of exploring whether more PBSA could be provided on campus to help facilitate growth in student numbers without impacting further on the city. This could only be achieved through the review of current car parking provision or through intensifying existing developed areas of the campus (without increasing heights or creating other adverse impacts) (p. 78).

Question: 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!

Sulis Club (p. 78) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=79>

[Bath Composite Plan \(bathnes.gov.uk\)](#) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.84 This is a sports ground owned by the University of Bath. It is on a gently sloping site on the edge of the plateau in a highly sensitive skyline location on the edge of the World Heritage site, and visible from the surrounding countryside.

5.85 The current policy SB19 states: Sulis Club Outdoor Sports area – Proposals for development will be judged against national planning policy within the NPPF, including that relating to AONBs and Green Belt, as well as the World Heritage Site and its setting and Outstanding Universal Values. For the Sulis Club this enables the appropriate redevelopment of previously developed land, within the parameters set by the NPPF.

Options:

- [A] No change to current policy SB19.

- [B] Consider and gather evidence relating to potential development on this site which is compatible with the requirement to protect the OUV of the WHSs and which will strengthen the important well-treed skyline (p. 78).

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

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.”

Bath Spa University at Newton Park (p. 79) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=80>

[Bath Composite Plan \(bathnes.gov.uk\)](#) = link to BANES Local Plan - Composite Volume: Core Strategy and Placemaking Plan incorporating the Local Plan Partial Update. Vol: 2 (Jan 2023) [for reference].

5.86 Bath Spa’s Newton Park Campus sits within a sensitive historic context including in the core of a registered (Grade II*) historic parkland ‘of outstanding interest’ which includes a Scheduled Monument (St Loe’s Castle), three Grade I listed buildings (The Manor House, Castle, and Castle Gatehouse); one Grade II* listed building (the Stables); and one Grade II listed building (the Dairy). The walls to the Italian Garden are also listed (Grade II*). The wider parkland beyond the campus also contains part of the Wansdyke Scheduled Monument and other listed buildings.

5.87 The campus lies in the Green Belt where development potential is constrained i.e. national policy makes it clear that development is inappropriate unless it is either complete or partial redevelopment or limited infilling as long as it doesn’t have a greater impact on openness than the existing development.

5.88 Ecologically the campus hosts a number of lesser horseshoe bat roosts, which forage in the surrounding parkland. Both the campus and the parkland in which it sits are within the Green Belt.

5.89 No material changes are proposed to the existing policy, however it will need to be reviewed and updated to reflect the latest terminology and correct references in the NPPF (p. 79).

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

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 (pp. 79-84) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=80>

Question: 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).

Question: 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.

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

No

The remainder of the page is left intentionally blank.

South of Burnett, adjacent to the A39 (pp. 82-84) (link:

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=83>

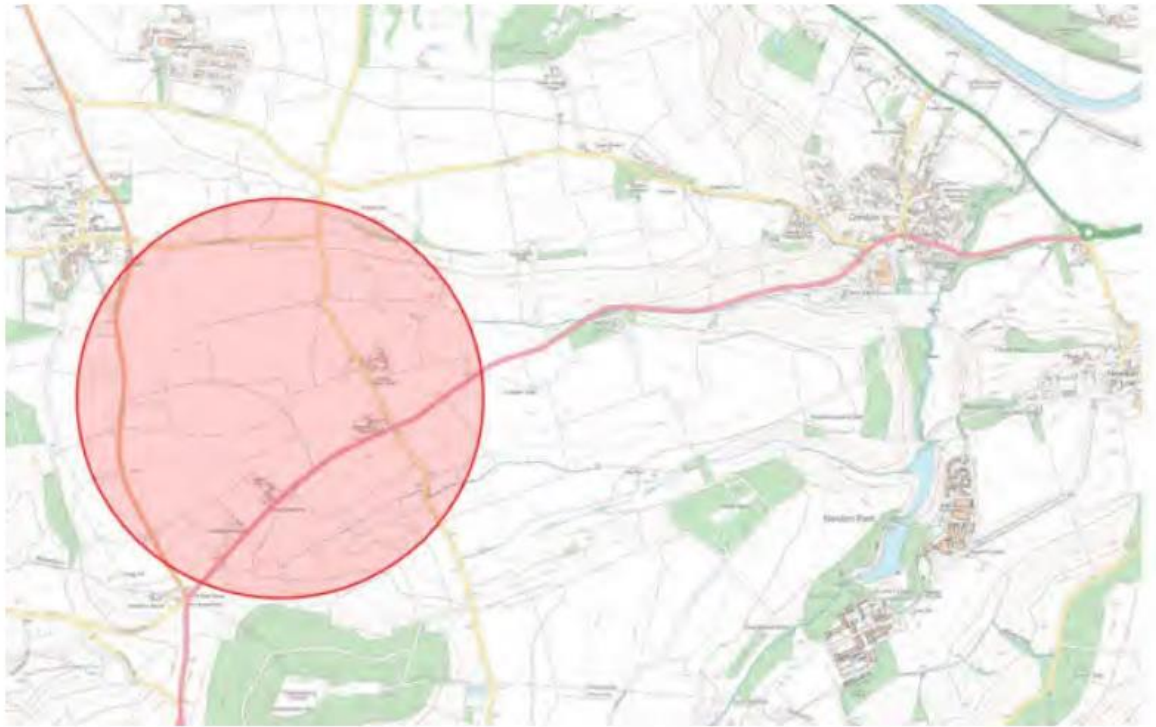


Figure 15 Broad area of search south of Burnett

Question: 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.

6 Bath to Bristol corridor (including Keynsham, Saltford, Hicks Gate and Whitchurch Village) [Identified as being beyond the remit of the review] (link: <https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=86>)

7 Somer Valley: Vision, Strategy and Options [Identified as being beyond the remit of the review] (link: <https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=166>)

8 Rural Areas: Vision, Strategy and Options (pp. 212-222) (link: <https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=213>)

[Sub-section) Village Options (pp.216-221)

Village options, including, but not limited to Bathampton, Batheaston, Bathford and Corston are in a table pp. 217-221.

Question: 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.

Question: 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.

9 Development Management Policy Options (pp. 223-396) (link: <https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf#page=224> [the reminder of the chapter is beyond the scope of the review])

Policy H/AH: Affordable Housing (large sites) (pp. 223-225).

9.4 Background and evidence can be found in the Housing Topic Paper and the Local Housing Need Assessment (LHNA) (p. 223).

[Local Plan Options Consultation Topic Paper: Housing | Bath and North East Somerset Council \(bathnes.gov.uk\)](#) = link to the Local Plan options Consultation Topic Paper: Housing.

<https://beta.bathnes.gov.uk/document-and-policy-library/local-plan-options-evidence-base-bnes-local-housing-needs-assessment> = link to Local Plan Options Evidence Base: B&NES Local Housing Needs Assessment.

H/AH: Affordable Housing (Large Sites)	Proposed Approach
1	<p>Affordable Housing will be required as on-site provision in developments of 10 dwellings* and above (0.5ha and above) in line with percentages set out in the LHNA and as tested through the Local Plan viability (whole plan) assessment. It is also proposed this will be on a grant free basis.</p> <p>*Note: that dwellings is not confined to C3 use class but comprises all residential accommodation that provides a dwelling for a household. Some forms of dwellings are subject to separate Affordable Housing policy options e.g.co-living and Build to Rent schemes.</p>

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

Yes

Policy H/AH: First Homes (large sites) (pp. 225-226).

H/AH: First Homes (Large Sites)	Option
1	<p>It is proposed that on qualifying large sites 25% of all affordable housing secured will be required to be delivered as First Homes. The First Homes will be provided at a 30% discounted price and sold at a price, after the discount has been applied, of no more than £250,000.</p>

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

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

9.12 Evidence of need for more affordable forms of housing for those that aspire to home ownership is corroborated by the Economic Strategy, which notes there is a need for housing that can be afforded by essential local workers and other workers in the local economy. Essential local workers are defined in the NPPF as ‘Public sector employees who provide frontline services in areas including health, education

and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers’.

9.13 The lack of availability and affordability of housing is making it difficult for some employers, including those in the public sector, to attract and retain staff. First Homes may play a role in helping to meet this need. In addition, there may be an opportunity for employers to provide affordable housing for their essential local worker staff on specific sites or land that they own. The Council is considering whether to introduce a policy approach that would seek to facilitate delivery of such employer linked affordable housing for essential workers on specific sites e.g. enabling 100% affordable housing schemes to be developed by potentially being more flexible in terms of tenure mix. Subject to evidence of need, there may be a case to allow such essential worker housing as an exception to other policies in the Local Plan (these would be defined in the Draft Local Plan) (p. 226).

Question: 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.

Question: 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

Small sites (pp. 227-229).

H/AH: Affordable Housing (Small Sites)	Option	Advantages	Disadvantages
A	Residential developments on small sites from 5 to 9 dwellings within the Cotswold National Landscape and Mendip Hills National Landscape should provide either on site provision or an appropriate financial contribution towards the provision of affordable housing with commuted sum calculations. The target level of affordable housing for these small sites will be viability tested through the Local Plan viability assessment to support the Draft Local Plan.	Delivery of affordable housing to meet the needs of local rural communities within the National Landscapes.	Would need to consider tenure mix and management of small numbers of affordable housing units.

B	Residential developments on small sites from 2 to 9 dwellings within the Cotswold National Landscape and Mendip Hills National Landscape should provide either on site provision or an appropriate financial contribution towards the provision of affordable housing with commuted sum calculations. The target level of affordable housing for these small sites will be viability tested through the Local Plan viability assessment to support the Draft Local Plan.	Delivery of affordable housing to meet the needs of local rural communities within the National Landscapes.	Would need to consider tenure mix and management of small numbers of affordable housing units.
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Question: Do you prefer option A or B? Please explain the reasoning (p. 229).

Option A, given proportionality.

Viability (pp. 229-233).

H/AH: affordable housing (viability) see the table(s) pp. 231-233.

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=157> (link to existing policy CP9 – Affordable Housing).

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

Option B as this seems more front loaded.

Policy H/RS: Affordable Housing Regeneration Schemes (pp. 234-235).

H/RS: Affordable Housing Regeneratio n Schemes	Option	Advantage s	Disadvantage s
A	Where the redevelopment/regeneration of areas of social housing is supported it is required that there will be no net loss of affordable housing subject to social balance considerations.	Maximise affordable housing delivery.	Viability considerations.
B	Where the redevelopment/regeneration of areas of social housing is supported it is required that there is no net loss of affordable housing subject to social balance and viability considerations.	Ensures and potentially maximises affordable housing delivery.	Could reduce affordable housing delivery.

Question: 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.

Policy H/RES: Rural Exception Sites, First Homes Exception Sites and Community Led Development Exceptions Sites (pp. 235-243).

Link to policy RA4 (Rural Exception Sites) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=160>

Policy H/RES: Rural Exception Sites (location) – table at pp. 237-238.

Policy H/RES: Rural Exception Sites (scale) – table at pp. 238-239.

Policy H/RES: Rural Exception Sites (cross-subsidy) – table at pp. 239-240.

Policy H/RES: First Homes Exception Sites – table at p. 242.

Question: [First Homes Exception Sites] Do you prefer Option A or Option B? (p. 242)

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

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

No comment.

Policy H/RES: Community Led Development Exceptions Sites – table at p. 243.

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

Option B

In general, we support community led development

Question: 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 – table at pp. 245-246.

Link to policy H1 (Housing and facilities for the elderly, people with other supported housing or care need) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=162>

Link to policy CP10 (Housing mix) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=163>

Question: 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) – table at p. 248.

Link for reference (LHNA) [Local Plan Options Evidence Base: B&NES Local Housing Needs Assessment | Bath and North East Somerset Council \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=157)

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

Yes

Policy H/AS: Accessible Homes – table at p. 250.

Link for reference (LHNA) [Local Plan Options Evidence Base: B&NES Local Housing Needs Assessment | Bath and North East Somerset Council \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=157) AG (18.03.24) - pp1-106 only

9.63 Where M4(2) and M4(3) cannot be delivered, the requirement would be to deliver M4(1) compliant dwellings (p. 251).

Question: 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.

Policy H/AS: Residential Space Standards – table at p. 253.

Question: 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.

Policy H/AS: Residential Space Standards in Market Housing – table at p. 254.

Question: 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 – table at p. 256.

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=157> (link to existing policy CP9 – Affordable Housing).

Link to policy CP10 (Housing mix) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=163>

Question: 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.

Policy H/BtR: Build to Rent Developments – Location of BtR Schemes – table at p. 258.

Link to Consultation Topic Paper (Housing) - <https://beta.bathnes.gov.uk/document-and-policy-library/local-plan-options-consultation-topic-paper-housing>

Question: 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?

Policy H/BtR: Build to Rent Developments – Affordable Private Rent Discount Level – table at p. 259.

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

Option A

Policy H/BtR: Build to Rent Developments – Affordable Private Rent homes required in each development – table at p. 261.

Link for reference (LHNA) [Local Plan Options Evidence Base: B&NES Local Housing Needs Assessment | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)

Question: 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.

Policy H/CL: Co-living Schemes – Location and Provision – table at p. 263.

Question: 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.

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

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=157> (link to existing policy CP9 – Affordable Housing).

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

Option A, should help bring this forward.

Policy H/CL: Co-living Schemes – Amenity Standards – table at p. 265.

Question: 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.

Policy H/PBSA: Purpose Built Student Accommodation - Provision and Location – table at pp 267 – 268.

Link to PolicyH2a (Purpose built student accommodation) - [Districtwide Composite Plan \(bathnes.gov.uk\)](https://www.bathnes.gov.uk/Document/10166/PolicyH2a-Purpose-built-student-accommodation-Districtwide-Composite-Plan)

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

Option A, restrict PBSA

Policy H/PBSA: Purpose Built Student Accommodation - Affordable Housing or Rent – table at p. 270.

Question: 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

Policy H/SBCHB: Self and Custom Housebuilding – table at pp. 272- 274.

Link to Policy H4 (Self build) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=171>

Question: 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

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

Link to Policy CP11 (Gypsies, Travellers and Travelling Show People) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=178>

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

The approach seems reasonable.

Policy H/M: Moorings (pp. 276-278).

Link to Policy H6 (Moorings) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=174>

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

Seems reasonable

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

Policy H/M: Moorings – table at p. 278.

Climate Change from p. 279.

Link to Policy SCR6 (Sustainable construction policy for new build residential development) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=68>

Policy C/RD: Sustainable Construction for New Residential Development – table at pp. 281-282.

Question: Do you prefer Option A, Option B or Option C? Please explain the reasons for your opinion on these options.

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.

Policy C/NRB: Sustainable Construction for New Non-Residential Development – table at pp. 284-285.

Link to Policy SCR7 (Sustainable construction policy for new build non-residential development) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=69>

Question: 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.

Policy C/EC: Embodied Carbon – table at p. 287.

Link to Policy SCR8 (Embodied carbon) - [Districtwide Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=61)

Question: 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.

Policy C/RE: Renewable Energy Target – table at p. 291.

Link to Policy CP3 (Renewable Energy) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=61>

Link to Policy SCR4 (Community renewable energy schemes) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page+71>

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

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'.

Policy: C/RE: Renewable Energy Approach – table at p. 293.

Question: 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'

Nature and Ecosystem Services – from p. 294.

Link to Policy NE3 (Sites, habitats and species) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=125>

Policy N/SHS: Sites, Habitats and Species – table at p. 295.

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

Yes, seems sensible/clear

Question: 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.

Policy N/BNG: Biodiversity Net Gain – table at pp.297-298.

Link to Policy NE3a (Biodiversity net gain) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=128>

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

Option B – seems to deliver more

Question: 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!

Question: Should we be seeking a minimum of no net loss and appropriate net gain for schemes exempt from mandatory BNG?

Yes

9.191 Government guidance refers to habitats of significance but as of now this is not defined (p. 299).

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

Yes

Policy N/GI: Green Infrastructure – table at pp. 301-303.

Link to Natural England (Green Infrastructure Framework) - [Green Infrastructure Home \(naturalengland.org.uk\)](https://naturalengland.org.uk)

Link to policy CP7 (Green Infrastructure) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=135>

Link to Policy NE1 (Development and green infrastructure) - [Districtwide Composite Plan \(bathnes.gov.uk\)](https://bathnes.gov.uk)

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

None of above - all have shortcomings

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

9.208 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper (p. 304) (link: [Local Plan Options Consultation Topic Paper: Natural Environment | Bath and North East Somerset Council \(bathnes.gov.uk\)](https://bathnes.gov.uk))

Policy N/OS: Open Spaces – table at p. 305.

Link to policy LCR6 (New and replacement sports and recreational facilities) - [Districtwide Composite Plan \(bathnes.gov.uk\)](https://bathnes.gov.uk)

Question: 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.

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

Policy N/TWC: Trees and Woodland Conservation – table at p. 308.

Link to Policy NE6 (Trees and woodland conservation) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=132>

Link to Policy D4 (Streets and spaces) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=98>

Question: 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 police requirements for management plans.

Question: 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.

Policy N/CELLC: Conserving and Enhancing the Landscape and Landscape Character – table at p. 311.

Link to Policy NE2 (Conserving and enhancing the landscape and landscape character) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=119>

Question: 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.

Policy Approach - Proposed Options Policy NE2A (p. 311).

9.224 Policy NE2A (link to policy - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=122>) remains fit for purpose and appears effective in use. The current policy accords with national and local strategies. The policy seeks to ensure that only development which conserves and enhances the landscape setting of a settlement takes place and that development which would adversely affect the setting is not permitted. The currently defined landscape setting of individual settlements are also considered to be

effective and justified. However, through this consultation there is an opportunity to identify whether the boundaries of any existing landscape settings identified on the policies map should be amended (p. 311) - link to the policies map: https://www.bathnes.gov.uk/webforms/maps/?center=51.33847657206234,-2.4489043644431634&zoom=11&map=planning&base=Ordnance%20Survey&categories=planning_landscapeandenvironment&wfslayers=mlyr-98864

9.225 Regarding landscape setting the following questions are proposed:

Question: 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 – table at p. 312.

Policy Approach - Proposed Options Policy NE2B (p. 312).

9.226 Policy NE2B (extension of residential gardens in the countryside) (link to policy - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=123>) remains fit for purpose. The current policy accords with national and local strategies. The policy is therefore, included in the policies listed in Appendix 1 (link: [Appendix 1: Policies to be retained | Bath and North East Somerset Council \(bathnes.gov.uk\)](#) as being retained without any changes (p. 312)

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

Yes agree

Policy N/FRSD: Flood Risk Management and Sustainable Drainage (p. 312).

Link to Policy CP5 (Flood risk management) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=81>

9.230 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper (link: [Local Plan Options Consultation Topic Paper: Natural Environment | Bath and North East Somerset Council \(bathnes.gov.uk\)](#) (p. 312).

Policy N/ FRSD: Flood Risk Management and Sustainable Drainage – table at pp. 314-315.

Question: 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.

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

Link to Policy NE4 (Ecosystem services) - [Districtwide Composite Plan \(bathnes.gov.uk\)](https://bathnes.gov.uk)

9.237 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper (link: [Local Plan Options Consultation Topic Paper: Natural Environment | Bath and North East Somerset Council \(bathnes.gov.uk\)](https://bathnes.gov.uk)) (p. 316).

Policy N/ES: Ecosystem Services – table at p. 317.

Question: 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.

Policy N/EN: Ecological Networks & Nature Recovery – Local Nature Recovery Strategies (p. 317).

Link to Policy NE5 (Ecological networks and nature recovery) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=131>

9.244 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper (link: : [Local Plan Options Consultation Topic Paper: Natural Environment | Bath and North East Somerset Council \(bathnes.gov.uk\)](https://bathnes.gov.uk)) (p. 318).

Policy N/EN: Ecological Networks (p. 319).

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

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

Green Belt pp. 320-321.

Link to Policy GB2 (Development in green belt villages) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=143>

Policy GB/GB: Infilling in the Green Belt (existing GB2) – table at p. 321.

Question: 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.

Jobs and Economy from p. 322.

Policy J/O – table at pp. 324-325.

Question: 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

Policy J/I: Strategic and Locally Significant Industrial Sites – table at p. 326.

Link to Appendix 2 (industrial sites to be protected) -

<https://beta.bathnes.gov.uk/sites/default/files/Appendix%202%20-%20Proposed%20Safeguarded%20Strategic%20and%20Locally%20Significant%20Industrial%20Sites.pdf>

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

Yes

Policy J/UI: Undesignated Industrial Sites – table at p. 328.

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

Yes

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

Policy J/EM: Employment and Skills – table at p. 330.

Question: 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).

Training benefits employer, employees and community.

Healthy and Vibrant Communities from p. 331.

Link to Policy CP12 (Centres and retailing) - [Districtwide Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=233)

Link to appendix (Proposed changes to district and local centre designations) - [Local Plan 2022 – 2042 - Options Document \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=233)

Policy HVC/TC: Town Centre Network and Hierarchy – table at pp. 334-336.

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

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.

Policy HVC/TCD: Development within Centres – table at p. 338.

Link to Policy CR3 (Primary shopping areas and primary shopping frontages) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=233>

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

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.

Policy HVC/LS: Dispersed Local Shops – table at p. 340.

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

Yes.

Policy HVC/H: Health and Wellbeing (p. 341).

9.297 Therefore, it is proposed to include a policy in the Local Plan that requires new development to contribute towards creating healthy places. This will be demonstrated through completion of a health impact assessment to be submitted as part of a planning application. Further evidence can be found in the topic paper (link: [Local Plan Options Consultation Topic Paper: Healthy and Vibrant communities | Bath and North East Somerset Council \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=233))

Policy HVC/H: Healthy Places – table at p. 342.

Question: 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.

Policy HVC/H: Health Impact Assessments – table at p. 343.

Question: 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.

Policy HVC/H: Hot Food Takeaways – table at p. 345.

Link to evidence base (Hot food takeaways) - [Local Plan Options Evidence Base: Hot Food Takeaway | Bath and North East Somerset Council \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=181)

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

Option A.

Policy HVC/CF Community Facilities – table at p. 346.

Link to Policy RA3 (Community facilities) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=181>

Link to Policy LCR2 (New or replacement community facilities) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=183>

Question: 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).

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

Policy HVC/PS: Safeguarding Land for Primary School Use – table at p. 347.

Question: 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).

Yes.

Policy HVC/PSC Primary School Capacity – table at p. 349.

Question: 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.

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.



Figure 63 Area that could be safeguarded for cemetery use

Policy HVC/C Safeguarding Land for Cemeteries – table at p. 351 (fig. 63, p. 350).

Question: 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.

Policy HVC/A Protecting Allotments (p. 352).



Figure 64: Proposed policies map amendment



Figure 65: Proposed policies map amendment

Figs. 64 and 65 (p. 353).

Link to Policy LCR 8 (Protecting allotments) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=200>

Policy HVC/A Protecting Allotments – table at p. 354.

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

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.

Policy HVC/B: Broadband (p. 355)

9.323 Building Regulations Part R requires new residential properties to be connected to broadband. The requirements of LCR7B are now required under building regulations. Therefore, this policy is no longer needed and is proposed to be deleted (p. 355).

Link to Policy LCR7B (Broadband) - [Districtwide Composite Plan \(bathnes.gov.uk\)](#)

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

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.

Policy HVC/LGS: Local Green Spaces (from p. 355).

Proposed Approach (p. 357)

9.335 The policy provides safeguarding against the loss of local green spaces which hold community value. The current policy accords with national policy and is fit for purpose. It is therefore proposed to retain the existing policy and to potentially designate additional local green spaces.

9.336 In total 72 sites have been nominated. Of the sites 34 are situated within the city of Bath, the remaining 38 set across the wider district.

9.337 Of these 72 nominations one nomination had been withdrawn, and two are already designated as local green spaces. The remaining 69 sites have been assessed in line with the above policy and methodology.

9.338 In line with the consultation and assessment the 26 sites proposed for new Local Green Space designation are outlined within Appendix 4 [[link to appendix: Appendix 4 - Proposed Local Green Spaces.pdf \(bathnes.gov.uk\)](#)]. The full list of sites nominated sites with completed pro-formas, and assessments can be accessed via the associated Local Green Spaces Topic Paper [[link to topic paper: Topic Paper: Local Green Space Assessments \(bathnes.gov.uk\)](#)].

Question: 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.

Question: 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.

Heritage and Design (from p. 359).

9.345 Adopted Policy CP6 is an overarching design policy. The policy seeks to ensure Bath & North East Somerset's environmental quality is fostered both for existing and future generations.

9.346 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=89)) (p. 360).

Policy HD/EQ: Environmental Quality – table at p. 360.

Link to Policy CP6 (Environmental quality) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=89>

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

Partially 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.

Policy HD/WHSS: World Heritage Site and its Setting (from p. 361).

9.349 Policy B4 seeks to prevent harm to the Outstanding Universal Value of the City of Bath World Heritage Site and its setting and is a material consideration when making planning decisions.

Link to Policy B4 (The World Heritage Site and its setting) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/2.%20Bath%20Composite%20Plan%20final.pdf#page=17>

9.350 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)) (p. 361).

Policy HD/WHSS: World Heritage Site and its Setting – table at p. 362.

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

Partially 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)).

Policy HD/HE: Historic Environment – from p. 362.

Link to Policy HE1 (Historic environment) - [Districtwide Composite Plan \(bathnes.gov.uk\)](#)

9.356 Policy HE1 aims to manage the historic environment in the most efficient and effective way, and to sustain its overall value to society. The policy also seeks to ensure the proper assessment and understanding of the significance of a heritage asset and the contribution of its setting in the development process.

9.357 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)) (p. 362).

HD/HE: Historic Environment – table at p. 363.

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

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.

[Policy HD/SCCW: Somersetshire Coal Canal and the Wansdyke from p. 363.](#)

Link to Policy CP6 (Environmental quality) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=89>

Link to Policy HE1 (Historic environment) - [Districtwide Composite Plan \(bathnes.gov.uk\)](#)

Link to Policy HE2 (Somersetshire Coal Canal and the Wansdyke) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=115>

9.364 These historic assets benefit from the provisions of Core Strategy Policy CP6 and Policy HE1. However, the importance of these linear routes is highlighted in a separate policy and are defined on the Policies Map with a buffer to catch the widest point of the assets.

9.365 Policy HE2 (seeks to ensure there is appropriate mitigation and/or enhancement (consistent with Policy HE1) for any development adversely affecting the physical remains and/or historic routes of the Wansdyke or Somersetshire Coal Canal, as defined on the Policies Map and/or their setting.

9.366 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](#) (p. 364).

[HD/SCCW: Somersetshire Coal Canal and the Wansdyke – table at p. 365.](#)



Figure 70: Proposed amendment to the Policies Map - Combe Hay Cemetery

Fig. 70 (p. 368.).

Question: 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?

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 is not applicable.

Question: 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.

Policy HD/GUDP: General Urban Design Principles from p. 369.

Link to Policy D1 (General urban design principles) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=95>

9.378 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)) (p. 370).

HD/GUDP: General Urban Design Principles – table at p. 371.

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

Partially 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.

Policy HD/LCD: Local Character and Distinctiveness from p. 371.

Link to Policy D2 (Local character and distinctiveness) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=96>

9.384 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)) (p. 372).

HD/LCD: Local Character and Distinctiveness – table at p. 372.

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

Partial objection. 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.

Policy HD/UF: Urban Fabric from p. 373.

Link to Policy D3 (Urban fabric) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=97>

9.389 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic](#)

[Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](#) (p. 373).

HD/UF: Urban Fabric – table at p. 373.

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

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

Policy HD/SS: Streets and Spaces from p. 374.

Link to Policy D4 (Streets and spaces) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=98>

9.393 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](#) p. 374.

HD/SS: Streets and Spaces – table at p. 375.

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

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.

Policy HD/BD: Building Design from p. 375.

Link to Policy D5 (Building design) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=99>

9.399 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (p. 375). (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)

HD/BD: Building Design – table at p. 376.

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

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.

Policy HD/A: Amenity from p. 377.

Link to Policy D6 (Amenity) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=100>

9.405 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](https://www.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=100)) (p. 377).

HD/A: Amenity – table at p. 378.

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

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').

Policy HD/IBD: Infill & Backland Development from p. 379.

Link to Policy D7 (Infill & backland development) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=101>

9.411 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](https://www.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=101)) (p. 379).

HD/IBD: Infill & Backland Development – table at p. 379.

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

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.

Policy HD/L: Lighting from p. 380.

Link to Policy D8 (Lighting) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=103>

9.418 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](https://www.bathnes.gov.uk/Local-Plan-Options-Consultation-Topic-Paper-Heritage-and-Design) (p. 380).

HD/L: Lighting – table at p. 381.

Question: 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.

Question: 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.

Question: 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.

Question: 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.

Policy HD/AOSF: Advertisements & Outdoor Street Furniture from p. 382.

Link to Policy D9 (Advertising & outdoor street furniture) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=105>

9.427 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council \(bathnes.gov.uk\)](#)) (p. 382).

HD/AOSF: Advertisements & Outdoor Street Furniture – table at p. 383.

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

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).

Policy HD/PR: Public Realm from p. 383.

Link to Policy D10 (Public realm) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=107>

9.433 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council bathnes.gov.uk](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=107)) (p. 384).

HD/PR: Public Realm – table at p. 384.

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

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.

Policy HD/DC: Design Codes from p. 384

9.437 The NPPF (para 133-134) sets out local authorities should seek to provide maximum clarity about design expectations at an early stage (p. 384).

9.438 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper (link: [Local Plan Options Consultation Topic Paper: Heritage and Design | Bath and North East Somerset Council bathnes.gov.uk](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=107)) (p. 385).

HD/DC: Design Codes – table at p. 386.

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

Yes. We are generally 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.

Sustainable Transport from p. 387.

Link to Policy ST1 (Promoting sustainable travel) -

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=246>

ST/HS: Promoting Sustainable Travel & Healthy Streets – table at p. 388.

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

Yes. Broadly we agree with the approach.

Policy ST/AT [active travel routes] from p. 389.

Link to Policy ST2 (Sustainable transport routes) -
<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=247>

Link to Policy ST2a (Active travel routes) -
<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=249>

ST/AT: Active Travel Routes – table at p. 390.

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

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

Policy ST/RMD [Transport Requirements for Managing Development] from p. 390.

Link to Policy ST7 (Transport requirements for managing development) -
<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=259>

Link to Policy ST1 (Promoting sustainable travel) -
<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=246>

ST/RMD: Transport Requirements for Managing Development – table at p. 391.

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

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

Pollution, Contamination and Safety from p. 392.

Policy PCS/NV: Noise and Vibration (p. 392).

Link to Policy PCS2 (Noise and vibration) -
<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=146>

9.454 The detailed background and evidence relating to the policy is set out in the Pollution Contamination and Safety Topic Paper (link: [Local Plan Options Topic](#)

[Paper: Pollution, Contamination and Safety | Bath and North East Somerset Council \(bathnes.gov.uk\)](#) (p. 392).

PCS/NV: Noise and Vibration – table at p. 393.

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

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

Policy PCS/AQ: Air Quality from p. 393.

Link to Policy PCS3 (Air quality) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=147>

9.459 The detailed background and evidence relating to the policy is set out in the Pollution Contamination and Safety Topic Paper (link: [Local Plan Options Topic Paper: Pollution, Contamination and Safety | Bath and North East Somerset Council \(bathnes.gov.uk\)](#) (p. 394).

PCS/AQ: Air Quality – table at p. 394.

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

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

Policy PCS/BHS: Bath Hot Springs from p. 395.

Link to Policy PCS8 (Bath hot springs) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=154>

Link to Policy M5 (Conventional and unconventional hydrocarbons) - <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=272>

9.465 The detailed background and evidence relating to the policy is set out in the Pollution Contamination and Safety Topic Paper (link: [Local Plan Options Topic Paper: Pollution, Contamination and Safety | Bath and North East Somerset Council \(bathnes.gov.uk\)](#) (p. 395).

PCS/BHS: Bath Hot Springs – table at p. 396.

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

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”.

[Minerals and Waste \(pp. 397 – 414\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=264) [Identified as being beyond the remit of the review] (link: <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=264>)

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

The list below sets out the policies adopted in the Local Plan Partial Update, Placemaking Plan and Core Strategy, which are not proposed to be updated through preparation of the Local Plan (p. 415).

Responding to climate change:

Policy CP1 Retrofitting Existing Buildings

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=54>

Policy CP4 District Heating <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=74>

Policy SCR9 Electric vehicles charging infrastructure

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=79>

Policy SCR2 Roof Mounted/Building Integrated Scale Solar PV

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=7>

Policy SCR5 Water Efficiency [Districtwide Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=7)

Policy SU1 Sustainable Drainage <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=85>

Policy CP5 Flood Risk Management

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=82>

High quality design:

Policy D5 Building Design <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=99>

Policy D8 Lighting [Districtwide Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=99)

Policy D1 General Urban Design Principles

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=95>

Policy D2 Local Character & Distinctiveness

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=96>

Policy D3 Urban Fabric [https://beta.bathnes.gov.uk/sites/default/files/2023-](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=97)

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Policy D4 Streets and Spaces [https://beta.bathnes.gov.uk/sites/default/files/2023-](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=98)

[06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=98](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=98)

Policy D6 Amenity [https://beta.bathnes.gov.uk/sites/default/files/2023-](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=100)

[06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=100](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=100)

Policy D7 Infill & Backland Development

[https://beta.bathnes.gov.uk/sites/default/files/2023-](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=101)
[06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=101](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=101)

Policy D9 Advertisements & Outdoor Street Furniture

[https://beta.bathnes.gov.uk/sites/default/files/2023-](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=105)
[06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=105](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=105)

Policy D10 Public Realm [https://beta.bathnes.gov.uk/sites/default/files/2023-](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=107)

[06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=107](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=107)

Landscape:

Policy NE2B Extension of residential curtilages in the countryside

[https://beta.bathnes.gov.uk/sites/default/files/2023-](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=124)
[06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=124](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=124)

Green Belt:

Policy GB3 Extensions and alterations buildings in the Green Belt

[https://beta.bathnes.gov.uk/sites/default/files/2023-](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=1)
[06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=1](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=1)

Policy GB1 Visual amenities of the Green Belt

[https://beta.bathnes.gov.uk/sites/default/files/2023-](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=142)
[06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=142](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=142)

Policy CP8 Green Belt [https://beta.bathnes.gov.uk/sites/default/files/2023-](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=141)

[06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=141](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=141)

Pollution, Contamination and Safety:

Policy PCS5 Contamination [Districtwide Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=141)

Policy PCS1 Pollution and nuisance [Districtwide Composite Plan \(bathnes.gov.uk\)](https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=141)

Policy PCS4 Hazardous substances

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=149>

Policy PCS6 Unstable land <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=151>

Policy PCS7 Water Source Protection Zones

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=152>

Policy PCS7A Foul sewage infrastructure

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=153>

Meeting Housing Needs:

Policy H2 Houses in Multiple Occupation

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=165>

Policy H3 Residential Use in Existing Buildings [Districtwide Composite Plan \(bathnes.gov.uk\)](#)

Policy H5 Retention of Existing Housing Stock

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=171>

Meeting Local Community and Recreational Needs:

Policy LCR1 Safeguarding local community facilities

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=181>

Policy LCR1A Public houses <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=182>

Policy LCR5 Safeguarding existing sport and recreational facilities

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=188>

Policy LCR7 Recreational development proposals affecting waterways

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=194>

Policy LCR7A Telecommunications development

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=194>

Policy LCR7C Commercial riding establishments

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=197>

Policy LCR9 Increasing the Provision of Local Food Growing

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=200>

Economy:

Policy RE1 Employment uses in the countryside [Districtwide Composite Plan \(bathnes.gov.uk\)](#)

Policy ED1A Office Development [Districtwide Composite Plan \(bathnes.gov.uk\)](#)

Policy RE2 Agricultural development

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=217>

Policy RE3 Farm diversification <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=218>

Policy RE4 Essential dwellings for rural workers

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=219>

Policy RE5 Agricultural land <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=220>

Policy RE6 Re-use of rural buildings

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=221>

Policy RE7 Visitor accommodation

<https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=222>

Centres and Retailing:

Policy CR1 Sequential Test <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=229>

Policy CR2 Impact Assessments [Districtwide Composite Plan \(bathnes.gov.uk\)](#)

Sustainable Transport:

Policy ST4 Rail freight facility <https://beta.bathnes.gov.uk/sites/default/files/2023-06/1.%20Districtwide%20Composite%20plan%20final.pdf#page=252>

Bath:

Policy SB14 Twerton Park <https://beta.bathnes.gov.uk/sites/default/files/2023-06/2.%20Bath%20Composite%20Plan%20final.pdf#page=119>

Policy SB24 Sion Hill [Bath Composite Plan \(bathnes.gov.uk\)](#)

Policy SB25 St Martin's Hospital <https://beta.bathnes.gov.uk/sites/default/files/2023-06/2.%20Bath%20Composite%20Plan%20final.pdf#page=138>

Policy SB26 Park and Ride Sites <https://beta.bathnes.gov.uk/sites/default/files/2023-06/2.%20Bath%20Composite%20Plan%20final.pdf#page=166>

Policy SB9 The Bath Press <https://beta.bathnes.gov.uk/sites/default/files/2023-06/2.%20Bath%20Composite%20Plan%20final.pdf#page=89>

Policy SB15 Hartwells Garage [Bath Composite Plan \(bathnes.gov.uk\)](#)

Policy SB16 Burlington Street [Bath Composite Plan \(bathnes.gov.uk\)](#)

Policy SB17 Englishcombe Lane Policy
<https://beta.bathnes.gov.uk/sites/default/files/2023-06/2.%20Bath%20Composite%20Plan%20final.pdf#page=125>

B3A: Land adjoining Odd Down, Bath Strategic Site Allocation [Bath Composite Plan \(bathnes.gov.uk\)](#)

Keynsham:

Policy KE2B: Riverside and Fire Station Site

Policy KE3C: East of Keynsham – Former Safeguarded Land

Policy KE3D: East of Keynsham – Former Safeguarded Land

Policy KE5: Treetops

Policy KE2A: Somerdale

Policy KE3A: Land Adjoining East Keynsham Strategic Site Allocation

Somer Valley:

Policy SSV4: Former Welton Manufacturing Site

Policy SSV21: Silver Street

Policy SSV9: Old Mills Industrial Estate (Incorporating Somer Valley Enterprise Zone)

Policy SSV22: Former Paulton Printworks

Policy SV2 Midsomer Norton Town Centre Strategic Policy

Policy SSV1: Central High Street Core Site

Policy SSV3: Midsomer Norton Town Park

Policy SSV17: Former Radstock County Infants

Policy SSV20: Former St Nicholas School

Policy SSV18: Somer Valley Campus

Policy SSV11: St Peter's Factory Site

Policy SV3: Radstock Town Centre Strategic Policy

Rural Areas:

SR5 – Pinkers Farm

SR14 – Wheelers Manufacturing Block Works PMP

SR15 - Land to the East of the St Mary's School Context

Question: 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.

Appendix 2 Proposed Safeguarded Strategic and Locally Significant Industrial Sites from pp. 422 - 423.

Appendix 3: Proposed Changes to District and Local Centre Designations from pp. 424 – 437.

Appendix 4: Proposed Local Green Spaces from pp. 438 – 452.

Appendix 5: Glossary • Please see link here: [Glossary of planning terms and abbreviations | Bath and North East Somerset Council \(bathnes.gov.uk\)](#) (p. 453).