

## B&NES' Placemaking Plan – Launch Version, 25<sup>th</sup> July 13

FoBRA Comments – final dated 20<sup>th</sup> Aug 13

Page	Para/Development area	Comment
General		A plea from those who have to read and comment on successive iterations of this document: please can we have an easy way to identify changes in new issues?
General		The Plan throughout ignores the existing high levels of traffic congestion and air pollution, which FoBRA, and others who care for Bath, consider to be one of the major challenges facing the city. Moreover, this omission has been observed in other significant Council documents recently, and it is one that FoBRA challenges vigorously. Secondly, in all the Plan's discussion of neighbourhoods, enterprise areas and development sites, there is no sense of Central Bath as a whole, or as a neighbourhood. Surely this is a crucial omission?
3	2	As stated above, consideration of Transport is vital and yet this cannot be assumed under the general heading of "infrastructure". Amend to read as follows: "...timely provision of the necessary <i>transport and other</i> infrastructure..."
3		Continuing on the same theme, this would be an appropriate point to state that the Plan will be supported by the Bath Transport Strategy. It is mentioned on page12, but the fact that development needs adequate transport provision is such a fundamental point that it needs to be covered from the very beginning.
4		Somewhere near the Plan's start (eg on page 4), FoBRA believes there should be a clear statement about saving specific planning policies from the current Local Plan into the new one, and spelling out: <ul style="list-style-type: none"> <li>a. That they will in general be saved;</li> <li>b. What, if any, process is available for modifying them.:</li> </ul>

4		<p>Another key point which should be addressed from the very beginning, in FoBRA's view, is that of Space Standards reintroduction, as, in parts of England (including B&amp;NES), rooms in new private houses have shrunk to nearly half the size of those in Germany and to 65% of those in London (where Space Standards are still in force). Even social housing has more room. Page 4 seems a good place for this to be stated as a principle, noting that Bath's MP, Rt Hon Don Foster, supported such a move, and launched a consultation about it on 20<sup>th</sup> Aug 13.</p> <p>After Core Planning Principles bullet 4 "Securing high quality design and amenity for existing and future occupants", therefore add ", including the observance of minimum space standards to ensure that residents have enough room for modern living."</p>
5		<p>The fourth of FoBRA's vital points to assist in preserving Bath, while ensuring the development that is necessary, is the principle of using brownfield land before greenfield. Page 5 seems a suitable and early place under "Core Strategy is Key" – Strategic Objectives: (Add "Brownfield before greenfield development"). Developers are likely to push for immediate greenfield exploitation but this must be resisted.</p>
5		<p>Add 'transport' to the areas covered by the core strategy. It is not the same as infrastructure (see comment on page 3 above).</p>
6&7		<p>"Context - Link with Neighbourhood Plans" as there are no Parish or Town Councils in Bath, this section seems to have no linkage with or relevance to its citizens. FoBRA is dismayed that the Council has no specific</p>
9		<p>This page addresses climate change, but how about prioritisation of development on brownfield land before greenfield, which FoBRA considers much more important (see comment on page 5 above)?</p>
10		<p>In the Bath Overview, development sites should be seen in the context of their wider implications. It is good that there is a series of sites, but they should be seen as a string of pearls, each connected to and dependent on the next, not as completely standalone projects. Insert after second paragraph: "This sustainable approach includes considering the development of each site in the context of the city as a whole, and of the neighbouring areas."</p>
11		<p>The first paragraph is woolly. The Enterprise Area is the core for Bath's future economy so it would be good if this section explained how the new economy will build upon, and fill in the gaps within, the existing economy.</p>
11	1	<p>Line 11. Amend to read: ..."Supported by <i>adequate transport and other</i> infrastructure..."</p>

11-12		Surely the Vision should come first – before the description of the Enterprise Area? The Vision should govern everything including a general principle of opening up the riverside (refer to the River Corridor Strategy).
12		The Vision should state forcefully the need to reduce the traffic congestion and air pollution which blights the city and damages its historic fabric.
12		“Range of initiatives” – add “Space Standards” and “Development on brownfield land before greenfield” – see comments on pages 4&5 above.
13	2	This refers to Policy B2 of the Core Strategy. It would be helpful to spell out what it actually says.
13 onwards		<p>FoBRA feels there should be a plan for the city centre as a whole, not just a series of development sites (on the lines of the Issues and Opportunities for the broad area in Twerton (p20)). Bath city centre is the most important economic and heritage area in B&amp;NES, and yet it is not treated as such.</p> <p>There are many issues affecting the centre, notably the traffic congestion and air pollution. Can it really be acceptable that a constant stream of heavy traffic, often brought to a standstill and therefore causing even more air pollution, passes through this World Heritage city centre? What about the impact on residents, workers and visitors (for whom Bath's traffic is notorious)? [See new section proposed below]</p> <p>Other issues might include hotel provision, licensing, the conversion of residential houses to short-term lets (hen parties), and parking policy. [See new section proposed below]</p>

Insert new section after page 14: "BATH CITY CENTRE. Under Policy B2 of the Core Strategy, the role of the central area (the city centre and neighbouring areas) is to provide:

- An important cultural asset for the world
- One of the country's most desirable and beautiful places in which to live and work
- A more dynamic place for business, enterprise, creativity and innovation
- An attractive centre for shopping, leisure and recreation
- A spa town that inspires, relaxes and entertains
- A visitor destination of international renown
- A place that connects people to the natural environment
- A place in which people increasingly travel by walking, cycling or by using public transport.

The achievement of these aspirations in the city centre faces a number of challenges:

a. First and foremost, traffic congestion blights the city centre and gravely affects the setting of the key elements of the World Heritage Site such as The Circus and Queen Square. Bath's traffic is notorious among residents and visitors alike. Is it really acceptable that a constant stream of heavy traffic passes through the very centre of this World Heritage City? Or do we want a city centre that is free of all but essential traffic?

b. Air pollution, which is due almost entirely to road traffic, is at levels well above safe health limits set out in EU and British law. These levels of air pollution are harmful to the health of those who live and work in, and visit, the city centre. Air pollution, and vibration from traffic, are damaging the very fabric of the Georgian city on which the visitor economy relies. Unlawful and unhealthy levels of air pollution are quite unacceptable and need to be reduced.

c. The Core Strategy envisages the creation of more hotel accommodation in the centre. A strategy is required for parking by visitors to these hotels, bearing in mind the parking needs of city centre residents.

d. A night-time economy has been created in the city centre which often involves excessive drinking, noise and anti-social behaviour. This is to the detriment of city centre residents and is frequently the subject of adverse comment by visitors. What sort of night-time economy do we want in the city centre?

e. Is ever-increasing retail the way forward or should we aim for a more varied economy in the city centre?

f. Is there a need to encourage long-term residents and owner-occupiers in the city centre? Owner-occupiers care for the Georgian houses at their own expense. Are we content to see large numbers of city centre houses turned over to be HMOs or short-term rental properties (such as hen party venues)? The latter can often be noisy and increasing numbers of such establishments add to the pressures felt by city centre residents.

15	SB1	<p>There are good questions on this page. Referring to bullet 4, there are arguments that the area should lead into Walcot Street (finer grained, and therefore recovering some more traditional character here). There is more than enough extension of the city centre (fewer bigger) at the new Southgate, Sorting Office, Manvers Street, and Bath Quays. The cattlemarket and unfinished end of the multi storey car park provide a dismal approach to the City.</p> <p>FoBRA suggests therefore that the river footpath should be completed to the same standard as the section that already exists below Waitrose. At the Northern end it should connect into the base of the Cornmarket and then rise internally to provide covered access across and into the start of Walcot Street beside the Tramshed. The Cornmarket would then also provide space for smaller market traders (possibly jewellery, etc) and would complement the Artisan's quarter. The cattlemarket should be redeveloped in the same style as the rest of Walcot Street, and neither large scale development nor additional car parks should be allowed.</p>
16	SB2	<p>The cross-river vision in bullet 2 is welcomed. A green avenue into the heart of Bath could be wonderful, by contrast with the more formal route along Great Pulteney Street.</p> <p>The notion of relocating bus and car parks to the Central Riverside and Rec areas will worry residents there.</p> <p>We question the creation of big new car parks (column 4) as the policy surely is to squeeze out central parking, to be replaced by P&amp;R; not to expand or reprovide it? Notwithstanding, coach parking and/or drop off in the Pulteney Road area are worthy of consideration.</p>
17	SB3	<p>Removal of Manvers St car park is supported.</p> <p>A desirable vision for this area might perhaps be for people arriving via Bath Spa station to have a choice – NW towards Southgate and the rest of the shops, or NE towards a new riverside path to St John's church/South Parade/Parade Gardens/Rec/Bath Rugby.</p>

17	SB4	<p>FoBRA feels that linking this area back into the city centre would be welcome, as well as creating access to the river, with minimal retention of car parking. The place for alternative parking might instead be Charlotte Street, with new shuttle buses serving the central area (in a loop with the station and Charlotte Street at opposite ends). Innovative architecture could be welcome in this location (but not high buildings), and a new pedestrian bridge should be built to ensure an active relationship with South Quays.</p> <p>This ought to be primarily a business/commercial quarter, and not just retail, as the provision of high quality office accommodation, both large and small, must be part of the mix, particularly at the high-wage end; with a smaller proportion of residential. Could the desire for a new concert hall/performance space be recognised in this area?</p>
18	SB5	<p>Is it necessary or desirable to retain more than the facades of historic industrial buildings? There is almost no public realm here to conserve. New buildings could be large, but not high, like the old ones.</p>
18	SB6	<p>This site surely revolves around Sainsburys' plans (dependent on the Tesco appeal decision)?</p> <p>Much open space is given over to car parking now, so (a) most of this could be built up in the future, compensating for this by designing in some open public realm through the process, and (b) some specialist retail could be introduced, such as an expanded market quarter in and around Green Park Station. However, a multi-storey car park in this area, additional to the one Sainsbury's propose, is not appropriate: it would be better to deck Charlotte Street.</p> <p>There is no justification for encouraging the evening economy into this area. By the time it has extended from George Street to Sawclose to Kingsmead Square to the Odeon, that seems enough.</p> <p>Removal of the gyratory would be welcome if it would improve the traffic flow along the Lower Bristol Road, the main east-west through route, and might release some space. However, the new pedestrian crossing lights have added significantly to westbound traffic delays, so some way to ameliorate this must be found. Sainsbury's seem unfocused on public transport, and they should be required to give this more attention.</p>

20		<p>FoBRA agrees that (a) these areas should be retained for business and industry, not given over to housing; and (b) Newbridge Riverside should remain the centre for industry in Bath. However, it would be good to see the strip along the Lower Bristol Road used more intensively for businesses other than car showrooms.</p> <p>Public transport needs to be improved on the Newbridge side of the river. Low rise buildings should probably be specified (like the factories there now) to protect World Heritage Site views.</p> <p>Riverside access should be improved, being poor on the Newbridge/Locksbrook side and almost non-existent on the Twerton bank.</p>
21	SB7	<p>In the immediate future, plans for this area are dominated by the result of the Tesco Appeal over the Bath Press site. FoBRA has no objection to the Bath Press facade being retained in any new building, but it should be incorporated, not just left as a freestanding wall. The alternatives (to Tesco) might include creative industries, or an enterprise zone to foster hi-tech and other start-ups, in association with one of the Universities, both of which would welcome closeness to Oldfield Park and to the station there.</p> <p>The unacceptable and above-limit pollution at the Windsor Bridge junction must not be forgotten – any plans for the Bath Press site must not exacerbate the congestion or pollution there; or else some form of traffic engineering will be needed.</p>
21	SB8	<p>There must be much potential for development in this rather depressing quarter, preferably business-led, with some residential near the river. Again there is scope to create riverside access on this further stretch of the southern bank.</p>
22	SB9	<p>FoBRA urges the Council to have the ownership problems on the Herman Miller site resolved and the building brought into use, either as a supermarket, or perhaps as a museum or exhibition centre.</p>
22	SB10	<p>No comment.</p>
23	SB11	<p>FoBRA believes it is important that employment uses should not be squeezed out in this area.</p> <p>We have proposed and supported a building heights policy in the past. This does not mean that all buildings should be the same height, because variation can be attractive, but none should be too tall (more than 3 storeys, say).</p>

23	SB12	<p>FoBRA supports creation and preservation of cycle tracks, and therefore to continuing the Bristol to Bath cycle track eastwards. However, if these are going to be shared paths, the experience can become unpleasant and hazardous for pedestrians. Given that the river has two banks and that there are unused assets like the old railway track, FoBRA questions whether there is scope to <b>segregate</b> cyclists from pedestrians for important stretches of this east-west corridor. Where there is no alternative to a shared path, it should be made wide enough for all users to feel safe. Segregation and widening is a policy which should be followed wherever such paths exist or are contemplated.</p> <p>As SB11 above, on building height policy.</p>
24,25		<p>The map on page 25 does not show neighbourhoods, despite the title on the lower box: it shows local centres. This needs to be clarified and neighbourhoods added to the map. Moreover, many of the places shown are no longer effective as local centres so perhaps should be deleted, as they are misleading (eg Lansdown Road, Camden Road &amp; Fairfield Park, London Road).</p> <p>Bath city centre is a neighbourhood too, with 10,000 residents, and should be listed as one. The issues raised at SB14, below, all apply to Bath city centre.</p>
26	SB13	<p>FoBRA is wary of generalisation. The map on page 25 shows such a variety of circumstances that each centre needs to be handled on its own merits.</p>
26	SB14	<p>FoBRA feels that, in many of these local centres, there are too many shops that are either struggling or closed or badly converted to residential (though possibly without proper approvals). Change of use to residential ought to be encouraged (or at least facilitated as an option) in such areas.</p> <p>The worst approach, we feel, is to spend a lot of money (eg as in London Road) to spruce up the environment, without reviving the local economy.</p>

27	SB15	<p><b>University of Bath:</b></p> <p>FoBRA believes inaccuracies may have crept into this section, and that the first sentences should be amended to read: "Land has previously been removed from the Green Belt through the adopted B&amp;NES Local Plan to <del>allow</del><b>facilitate</b> the long term development of the University and <del>provide additional student housing and academic space</del> at its Claverton Down campus. Development to provide the additional accommodation and <del>other facilities</del> required by the University <del>through the preparation of a revised masterplan</del> <b>to 2026 is specified in a revised Masterplan 2009-2026</b> for the whole campus <b>as endorsed by B&amp;NES in 2013</b>. This includes a full and detailed assessment of the appropriate development capacity of the campus including the part removed from the Green Belt. The University's expansion aspirations over the longer term may require looking at additional solutions in or beyond the city."</p> <p>Moreover, it is understood that:</p> <ol style="list-style-type: none"> <li>a. There has never been any agreement to allow student accommodation on the land removed from the Green Belt.</li> <li>b. With reference to the two subsequent questions, a framework already exists in the form of an agreed campus Masterplan to 2026, to which all development has to conform. Any future Masterplan update should include, as previously, formal consultation with all stakeholders, including local residents, and eventual endorsement by B&amp;NES.</li> </ol> <p>FoBRA would not want to impede development of the University of Bath, which is one of the jewels in Bath's crown, but a new Masterplan needs to be discussed wider than just with local residents. The importance of the University, and its sensitive location, mean that the consultation should be city-wide.</p> <p>The building heights policy should apply particularly to anything built at Claverton Down.</p>
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27	SB15	<p><b>MoD sites:</b> Redevelopment at each of the MoD sites will have an impact beyond its immediate footprint, so there probably does need to be more guidance than the Concept Statements produced already. For example:</p> <ul style="list-style-type: none"> <li>• Enslough: <ul style="list-style-type: none"> <li>○ The top of Lansdown is a very blank area, on the very edge of the city, albeit pleasantly leafy. Can the Enslough project help to bring life and local services to it (and should it, or will this simply lead to sprawl and city spread)?</li> <li>○ By contrast, unless local services are enabled and encouraged there, how will the residents get their supplies &amp; services, other than by using cars or by provision of good public transport?</li> <li>○ The housing density proposed is significantly higher than that in nearby streets, so will this lead to a “ghetto” there?</li> </ul> </li> <li>• Foxhill: Can the new owners (Curo) encourage integration with the local area by interlinking the existing streets with those created onsite?</li> </ul>
27	SB15	<p><b>Twerton Park:</b> It would seem likely that commercial employment use would be more important than more retail or residential in this location.</p>
27	SB15	<p><b>Other neighbourhoods:</b> Some ideas could be:</p> <ul style="list-style-type: none"> <li>• The long-term future of the RNHRD at Upper Borough Walls must be questionable There should be a plan for this important location.</li> <li>• The Charlotte Street car park area, including the school and tennis courts, is an obvious area for improvement.</li> </ul>
28	SB16	See MoD sites – Enslough, above.
28	SB16&17	For SB16 and SB17 public transport must be favoured; otherwise these will just become car-based commuter dormitories.
29-44		No comment
45		<p><b>Topic areas:</b> FoBRA wishes to add:</p> <ul style="list-style-type: none"> <li>• Space Standards</li> <li>• Brownfield before greenfield development</li> <li>• Traffic congestion</li> <li>• Air pollution</li> </ul>
46	DP1	<p><b>Food:</b> FoBRA has reservations about the climate change benefits of local food. Being small scale, it normally leads to higher emissions than non-local food bought from supermarkets. This is not something the Council should spend our money on.</p>

47	DP2	<b>Allotments &amp; Local Food Production:</b> In addition to remarks on p46 above, FoBRA supports the safeguarding of allotments and the 'best and most versatile agricultural land' (though there is very little of it in B&NES).
47		<b>Securing Sustainable Design - Overarching Principles:</b> Add to bullet 1 "...and space standards."
48	DP3	Add to bullets: <ul style="list-style-type: none"> <li>• Space Standards</li> <li>• Easy access to public transport.</li> </ul>
49	DP4	<b>Some Overarching Principles:</b> <ul style="list-style-type: none"> <li>• (bullet 3) Why does brownfield before greenfield only apply to employment land? It should be the principle for all development, including housing.</li> <li>• (bullet 6) FoBRA agrees with concentration on high-wage employment opportunities, such as knowledge-driven. Development of the night time economy (see SB6, p18) is exactly the kind of low-wage activity Bath has too much of already; retail similarly.</li> </ul>
49	DP4	<b>Discussion Points:</b> (bullet 1) FoBRA supports some protection for employment land, given the insatiable demand (and shortage of locations) for housing. We talk about the need for premises for a knowledge-based economy: the Council could look at what has worked elsewhere (eg Paintworks in Bristol).
50	DP5	There is surely a need for a flexible approach towards new uses for existing buildings in rural areas, even if they are in the Green Belt. Further modest development in already developed areas should not be ruled out.
51		As the principal urban centre in the district, Bath city centre merits consideration in its own right in this section of the plan. Consideration should be given to making it a Historic Core Zone as developed by the English Historic Towns Forum in conjunction with the Department for Transport, English Heritage and the Civic Trust.
52	DP6	<b>Discussion Points:</b> Bullet 3: The existing protection for the primary retail frontage in the centre of Bath stops at the top of Milsom Street. It has led directly to the over-concentration of licensed premises in George Street, because this is as close to the city centre as they are allowed. As a consequence, the amenity of local residents has been severely compromised. FoBRA believes this policy needs to be relaxed, so that these bars, etc, are dotted around the city not concentrated in one area.  Bullet 4: Local centres should be protected, but only where they have a chance of being viable (eg Larkhall, Moorland Road, Bear Flat, Weston, Twerton High Street).

52	DP6	<p><b>Housing issues – Some Overarching Principles:</b> Principle 2 reads "Make the most efficient use of land." How does one define "efficiency" in this context? Unless this can be defined it were best omitted. Add two extra principles:</p> <ul style="list-style-type: none"> <li>• Impose Space Standards</li> <li>• Require brownfield land to be developed before greenfield.</li> </ul>
52-53	DP6 and DP7	<p><b>Housing Density:</b> If the Council believes good design is a function of density (see second sentence: "In B&amp;NES, the issue of residential density is an important consideration in securing good design.....") it should not specify a minimum density for housing developments irrespective of context (see Housing Density para 2 and DP7, p53 - 30 dph or as high as 50dph in some locations).</p>
53	DP7	<p><b>Other Specific Housing Need:</b> The last lines state: "National Planning Policy stresses the importance of delivering a wide choice of high quality homes." However, FoBRA sees nothing in the Placemaking Plan that indicates recognition of the need for minimum space standards as a vital part of high quality homes (see FoBRA's introductory remarks on p4, above). RIBA's response (Aug 2013) to the Farrell Review of Architecture and the Built Environment states: "To ensure new homes provide the types of environment people want to live in, the government should introduce national minimum space and light standards into the Building Regulations for new houses regardless of tenure and location." FoBRA therefore urges the Council to follow RIBA's call and the lead (and standards) set by London.</p>
54	DP9	<p><b>Overarching Principle:</b> Add "...and add new land to green belt to compensate for any appropriated for development under this plan."</p>
55	DP11/12	No comment
56		No comment.
57	DP13	<ul style="list-style-type: none"> <li>a. Where is reference made to B&amp;NES' recently approved GI policy?</li> <li>b. What about reference to the recently approved WHS Setting SPD?</li> </ul>
58	DP14	What about reference to the recently approved WHS Setting SPD?
59	DP15/16	No comment.
60		<p><b>Some Overarching Principles:</b> Add –</p> <ul style="list-style-type: none"> <li>• "Protect the historic environment from the traffic congestion and air pollution that currently disfigure and damage it."</li> </ul>

61		<p><b>Sustainable Transport - Context:</b></p> <ul style="list-style-type: none"> <li>a. The first sentence should mention the fact that Bath already suffers from high levels of traffic congestion and air pollution (the latter evidenced by the fact that the entire main road network has been designated as an Air Quality Management Area). It is not just a question of minimising congestion due to <i>new</i> development, important as that is, but of addressing the woes that already exist.</li> <li>b. Amend final sentence to read: “<i>These principles will be derived from Bath’s Transport Strategy (being developed separately) and will underpin the sustainable transport policies in this Plan.</i>”</li> </ul>
61		<p><b>Sustainable Transport - Some Overarching Principles:</b></p> <ul style="list-style-type: none"> <li>• Add to bullet 2: “...while making appropriate provision for residents’ parking.”</li> <li>• Bullet 3: Clarify. The meaning is not clear.</li> <li>• Bullet 4: Clarify. Does this mean that new routes always have to be provided, but that they must be “safe and sustainable”? What does this mean, anyway?</li> <li>• Add new bullet 6: “Encourage separation of cyclist, pedestrian and vehicle routes.”</li> <li>• Add new bullet 7: “Reduce existing high levels of traffic congestion”.</li> <li>• Add new bullet 8: “The need to reduce associated pollution (from nitrogen dioxide and particulates) must be mentioned, together with its significance for health and to the law.”</li> </ul>
62		<p><b>Key Transport Infrastructure:</b> Give details of first 3 retained schemes or where this detail can be found.</p>
62	DP19	<ul style="list-style-type: none"> <li>• Bullet 1- details of these retained schemes must be made available before they are considered for elimination.</li> <li>• Bullet 2 – consider adding (a) rail trackbed where Bus Rapid Transit would have been built (ie from the east end of the Bristol/Bath cycling track at Brassmill to Station Road), and (b) road widening capability on Lower Bristol Road between Windsor Bridge junction and Twerton Fork.</li> <li>• Add new bullet 3: “The need for the shortest possible A46/A36 link road to remove excess traffic from London Road and Bathwick Street.”</li> </ul>

62	DP20	<ul style="list-style-type: none"> <li>• Bullet 1: No traffic management proposals currently exist for the whole of the centre of Bath (ie including George Street, Queen Square and Circus).</li> <li>• Bullet 2: FoBRA wishes to see through traffic discouraged or prevented from passing through Bath city centre (ie George Street/Queen Square). Queen Square and The Circus are Key Elements of the World Heritage Site (identified as such in the WHS Management Plan). George Street is a busy shopping/restaurant street which also forms a link (currently a major barrier) between the main shopping centre and the principal Georgian heritage sites.</li> </ul>
62	DP21	<ul style="list-style-type: none"> <li>• Bullet 1: .The P&amp;Rs should operate for much longer, with suitable security for vehicles parked overnight. At present the P&amp;Rs are of no use to overnight or late-night visitors.</li> <li>• Bullet 2: The plan should urgently identify a P&amp;R site to the east of Bath.</li> </ul>
63	DP23	<ul style="list-style-type: none"> <li>• Bullet 4: Most of the Bath road system already carries an "excessive volume" of traffic on "unsuitable roads" in "environmentally sensitive areas". This existing traffic must be dealt with, as well as preventing the introduction of even worse traffic.</li> </ul>
63	DP24	As part of the wider debate on the lowering of car parking levels in some areas, FoBRA feels that visitor parking in the city centre should be reduced as new P&R capacity becomes available, otherwise traffic will continue to flow into the city in search of parking spaces. Provision of new parking in the city centre should be discouraged.
64	DP25-27	No comment.
65-66	DP29&31	FoBRA is in agreement with these proposals. Moreover, the Council should lobby central Government to apply this policy in neighbouring Authorities where there could be an impact on the Hot Springs.
65	DP30	<b>Pollution, Health &amp; Safety - Some Overarching Principles:</b> Add new bullet 5: "As road transport is the biggest source of air pollution, introduce a Transport Strategy for Bath which reduces this to safe and legal levels."
66	DP32	<b>Other Issues and Policies:</b> This section implies that only selected existing Local Plan policies will be saved. Surely the principle should be that they are all saved unless there is a case for modifying or deleting them? For example, none of the points on this list will protect residents from the impact of new licensed premises in their area (and yet there must be a policy for this, retained or established anew).

## Typos, etc, observed

Page	Para/Development area	Comment
General		The spelling of the word “focused” needs to be correct. Throughout it is randomly spelt correctly or as “focussed”.
4		“What the Placemaking Plan will do.” Sentence 1 has no ending. The Plan will “be prepared” but for what?
4		“Core Planning Principles” It needs “Being...” at start of sentence. First verb in each needs to be changed from 3 <sup>rd</sup> person present. Either to infinitive (eg “To take...”) or to the gerund ((eg “Taking...). In bullet 7 this needs to be done in 3 places.
10		Sentence 1 needs to be rewritten: at present it is nonsense.
11		“Unchartered” should read “uncharted” (last para).
12		Para 3 sentence 1: “Will be” – repetition. Para 4 – “Bath’s” instead of “Baths”.
15		Everything is described as “Key”. This word is overused. “fine” instead of “fined”.
17	SB3	Lots of management jargon. Let’s simplify it, particularly bullet 1. Shorter sentences needed: with some of them the reader loses the will to live before reaching the main clause.
18	SB6	Several typos (eg in bullets 1, 3...)
20		“Policy Context” – What are “B1A-C” “B1” and “B1C”? We should not introduce jargon or mnemonics without explaining them. “Issues and Opportunities.” This is a rather confused section. Does it lay down principles or name streets? (sub-bullets 4&5) – Should be “Retaining, Enhancing and Protecting”
21		SB8 – First sentence is very long, with some bad and confusing grammar after “but”.
22		Grammar: “defences” not “defenses”.
45		Para 3 – sentence too long.
46		“Overarching Principles” – both paras on “Sustainable Construction” and “Renewable Energy” have long sentences and jargon.
47		“Allotments and Local Food Production” Para 1 – this is a single (very long) sentence. Para 2 – What is the meaning of “loss” (first line)?
51		Poor picture of Moorland Road – all cars and no people!
54	DP9	“Green belt context” – “As a significant....considerations” –

		Sentence too long.
55		“Previously developed sites” – Para 2 – “Exceptions ....existing development.” – Sentence too long.
56		“Green infrastructure” – para 3 “When looking.....works together.” – this needs to be redrafted as it is currently nonsense. “As well as.....into the future.” – sentence too long.
59		“Natural environment” – word missing in second sentence.
60		“Context” – Para 3 “The policy framework.....sense of Place.” – sentence too long.
63	DP23	last bullet – delete “Expect” as it is redundant.
66		“Bath Hot Springs” – “This policy.....Minerals Section.” – reword, as currently some words missing and so nonsense.

Robin Kerr, Secretary, final dated 20<sup>th</sup> Aug 13