

Email to: Richard Daone, Planning Policy, B&NES Council.

23rd Jan 15

Dear Richard,

As you know, FoBRA took a very active interest in the development of the Core Strategy, on behalf of its 33 members, taking the trouble to read the documents, submit comments, and attend the several Examinations in Public (and speak there). Similarly, we have been greatly engaged with the recently published Placemaking Plan – Options Document – as it delves into so much crucial detail. It is impressive, touching on many subjects which are relevant, and with which we are already familiar, so our commenting on it and discussing it with you was vital. As you know, we created a Working Group, drawn from a broad range of our members, drafted a preliminary set of observations and suggestions (attached) and held a first meeting with some of you on 10th Dec. As they will have noted, the issues which particularly concern us are the following:

- **The need for Central Bath to be treated as a “Place” in its own right.** The most important existing asset in B&NES is the historic core of the Bath World Heritage Site; but the draft Plan contains no policy for the central area considered as a whole. Keynsham, Midsomer Norton and Radstock town centres are described this way, and so should Bath. However, the centre of Bath is presently viewed as no more than a series of new development sites.
- **The need for Housing Space Standards.** About half of English Local Planning Authorities impose minimum space standards on new commercial housing, but not B&NES, with the result that many of our new-build houses are cramped, often with less space than social housing (where standards still exist). This is not worthy. DCLG is currently consulting on a scheme to rectify this, and we commend its introduction here.
- **The lack of a Student Housing Policy.** Firstly, B&NES has published as evidence two documents which need revision as they are seriously inaccurate: the SPD for Houses in Multiple Occupation (HMOs) (July 13) and the Student Numbers and Accommodation Requirements Information Paper (July 13, updated Aug 14). FoBRA has developed a more accurate Student Numbers document, which is attached. Secondly, although you have a good policy for HMOs, you do not for student housing blocks in the city, and one is needed. Applications to build these blocks in Bath are accelerating and yet there is no policy satisfactorily to regulate this. Other Local Authorities have adopted wording which seems to work and which might be “borrowed”.
- **Correlation with the recently approved Transport Strategy.** At the 12th Nov Cabinet meeting, when the Placemaking Plan was approved for consultation, the Bath Transport Strategy and the Enterprise Area Masterplan were cited with it as parts of a co-ordinated suite of B&NES strategy and policy. However, the Placemaking Plan presently does not mention the Transport Strategy until page 270, and many parts of the two documents are inconsistent.
- **The use of Brownfield sites before Greenfield.**

I hope you will have seen that, while supporting the proposed policy and Plan in general, we have reasonable interests and concerns in the areas listed; we have taken the draft Plan seriously; and we have made responsible and intelligent comments. On

that basis, having engaged with those who wrote and are writing, the Plan; and, following our 10th Dec meeting (unfortunately without you), hope to see many of our thoughts and much of our material incorporated, as we think this will make the Plan even better and robust than it is already. Following the 10th Dec meeting, FoBRA's thinking on the Placemaking Plan has matured and evolved. Late drafts were discussed and approved by the full FoBRA Committee on 20th Jan, resulting in the enclosed final version (in both pdf and Word, for your convenience). In addition I have attached a FoBRA-developed Student Numbers document which is more accurate than the Council's one, and this is referenced in our comments.

This is FoBRA's complete and only response to the current Placemaking Plan consultation. I should be grateful for confirmation of its readable receipt by you.

Robin Kerr



Chairman, Federation of Bath Residents' Associations

3 Lansdown Place East

Bath BA1 5ET

robin.kerrconsulting@uwclub.net

www.bathresidents.org.uk

01225 311549, 07767 788366

Placemaking Plan Options – FoBRA Comments

[These comments refer to the Consultation edition of B&NES' Placemaking Plan issued on 24th Nov 14: see www.bathnes.gov.uk/placemakingplan.]

The comments of the Federation of Bath Residents' Associations (FoBRA) on this document mirror those made by it in Aug 2013, principally revolving around the following subjects, with the detail being under the appropriate page and paragraph in the tabulation below:

- Central Bath as a “Place” in its own right
- Space Standards
- Student Housing Policy
- Transport Strategy
- Brownfield before Greenfield

Page	Para	Title	Justification	Comment
9	1.14	Placemaking Plan Bath: The Aim	Establishment of broad aims and important themes.	Para 1 of the introduction states that Placemaking is concerned with..."the protection and enhancement of existing assets", as well as development sites. The most important existing asset in B&NES is the Bath World Heritage Site (WHS), particularly its historic core; but the draft Plan contains no policy for the central area of Bath considered as a whole, or for the wider urban landscape within the WHS. The centre of Bath is treated as no more than a series of new development sites. Keynsham, Midsomer Norton and Radstock town centres are treated as a whole (paras 1.169, para 1.225, 1.272, Strategic Policy Context), and so should Bath. The centre of Bath requires a holistic approach. Part 1 page 6 goes straight into development sites, with no mention of a policy for existing assets such as central Bath (para 1.13 onwards). In doing so, it fails to provide a context and vision for development within the centre, which is essentially not treated as a 'Place' at all. In fact, the treatment of Bath City Centre in this document lacks the visionary touch of an architect or an architectural committee, such as the Urban Regeneration Panel, now sadly disbanded. FoBRA recommends that it, or something like it, be reinstated, especially at such an important time for development in the centre of this WHS.

				<p>Insert after para 1.14—Strategic policy context</p> <p>1. The City of Bath is a place of global importance, a fact recognised by its inscription as a UNESCO World Heritage Site (WHS) having attributes of Outstanding Universal Value. The City of Bath World Heritage Site Management Plan [link] explains the significance of the WHS and addresses the management, pressures and challenges facing the site. The WHS designation also stresses the fundamental interrelationship between the historic architecture throughout the city and the green spaces which interpenetrate it.</p> <p>2. The central area of Bath (broadly the area between Julian Road to the north and the river on the south, the A36 Bathwick Street to the east and Charlotte Street on the west) contains the historic core of the Bath World Heritage Site as well as the commercial heart of the city and is the most significant cultural, historical and commercial asset within B&NES. No fewer than 9 of the 12 Key Elements of the Site identified in the WHS Management Plan lie within the central area of the city, and two of the others are close by. This section sets out to provide a context and vision for the protection of this vital asset and for development within the central area.</p> <p>3. Under Policy B2 of the Core Strategy, the role of the central area is to provide:</p> <ul style="list-style-type: none"> • 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. <p>4. The B&NES Public Service Board has the vision that "Bath and North East Somerset will be internationally renowned as a beautifully inventive and entrepreneurial 21st century place with a strong social purpose and a spirit of wellbeing, where everyone is invited to think big – a 'connected' area ready to create an extraordinary legacy for future generations."</p> <p>5. In this spirit, and in order to achieve the aspirations set out in the Core Strategy, our policies for central Bath include the following:</p> <ul style="list-style-type: none"> • The Public Realm and Movement Strategy (PRMS) [link], which is at the heart of the vision for central Bath. The PRMS is an incremental plan to transform streets and spaces across the centre and to create the canvas for a more animated and inclusive public life. The strategy aims to:
--	--	--	--	--

				<ul style="list-style-type: none"> ○ Rebalance the movement hierarchy giving priority to pedestrians, cyclists and public transport; ○ Refashion the public realm, creating a lattice of connected streets and spaces, utilising high quality materials, bespoke furniture and exceptional landscape and lighting design; ○ Reveal the city through the introduction of a new multi-channel information and wayfinding system for all modes of movement; ○ Reanimate the city centre through an imaginative and pioneering programme of public art, events and activities. <ul style="list-style-type: none"> ● Creation of a city centre that is free of all but essential traffic, and which provides an environment that is attractive for the visitors on which the city's economy relies, as well as for those who live and work in Bath. Currently, central Bath suffers from serious traffic congestion, which 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. Air pollution and vibration from traffic are damaging the very fabric of the historic city. ● Good air quality - an essential element of this improved environment. Air pollution, which is due almost entirely to road traffic, is at levels well above safe health limits set out in EU and English law and must be brought down to safe and healthy levels (see Bath Air Quality Action Plan). ● Reduction of traffic and improvement of air quality. These will be achieved through the Bath Transport Strategy, which complements the Placemaking Plan, and contains the Vision that "Bath will enhance its unique status by adopting measures that promote sustainable transport and reduce the intrusion of vehicles, particularly in the historic core". The measures required to achieve this include: <ul style="list-style-type: none"> ○ A walking/cycling strategy to make Bath the UK's most walkable city; ○ Improved accessibility for people with mobility impairments; ○ A parking strategy to support the economic growth but at the same time reducing the amount of off-street spaces within the city centre; ○ A traffic management plan for the city; ○ Support for more use of public transport to reduce the number of cars entering the city; ○ A new Park-and-Ride to the east of Bath, and continuing expansion of the existing Park & Ride (P&R) sites, which can to help reduce the demand for parking spaces within the city; ○ Better management of Heavy Goods Vehicles within the city; ○ Finding a new location for coaches to park once they have dropped visitors off in the city centre. <p>The Placemaking Plan will need to ensure that the infrastructure necessary to implement the transport strategy is delivered in a timely manner. The transport strategy also includes work with the Highways Agency, Wiltshire and other authorities to develop proposals and</p>
--	--	--	--	--

				<p>strategies to remove through traffic and HGVs, in particular, from Bath which may generate a requirement for new infrastructure.</p> <ul style="list-style-type: none"> • The prosperity of Bath depends on maintaining the city as a place which draws visitors who are attracted by the mix of shops, restaurants, and cultural and heritage facilities. We aim to ensure that Bath promotes a distinctive shopping experience at the leading edge of retail development, and that Bath is seen as the place for high quality, locally produced goods and foods. (From The Future for Bath Vision)<i>[Is ever-increasing retail the way forward or should we aim for a more varied economy in the city centre?][Role of non-retail businesses in the centre?]</i> • Promoting Bath as a 'Spa' City; providing a high quality tourist experience where visitor stay is extended; enhancing the cultural and visitor offering; and promoting the City as a world class venue for sport and recreation. (From The Future for Bath Vision) • Central Bath is unusual in that it is home to a large number of residents as well as shops, businesses and heritage sites. Some ten thousand people, including many families, live in central Bath. This large number of residents contributes to the vitality and vibrancy of Bath, day and night; and to the special character of the city centre. Owner-occupiers care for the historic Georgian houses at their own expense. We will encourage and support residents in central Bath. • 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. Hotel visitors should be encouraged to use the P&Rs, but this will require the P&Rs to be open later and to have secure overnight parking. Consideration should be given to a shuttle service of suitable vehicles for overnight visitors, serving the hotels and guest houses. • 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. <i>[We will...]</i> • Large numbers of city centre houses have been turned over to be Houses in Multiple Occupation (HMOs) or short-term rental properties (such as hen party venues). The former add to housing pressure in the already densely populated centre, and are often less well maintained. Change of use from residential to HMO now requires planning permission across Bath. The latter can often be noisy and increasing numbers of such establishments add to the pressures felt by city centre residents. <i>[Our policy is...]</i> <p>6. Within the city (which is coterminous with the WHS), but outside the central area, there are many important architectural features (including two of the Key Elements of the WHS (Lansdown Crescent and Prior Park)), together with parks and other open green spaces such as Sydney Gardens, another Key Element. These are also important to the character and feel of Bath and require</p>
--	--	--	--	---

				protection.
9	1.19	The Evidence Base	Ensuring that the Evidence Base includes all the right documents.	<p>It is accepted that the list of sources at para 1.19 is not exhaustive, but the evidence base should surely include an agreed Student Numbers and Accommodation Requirements paper; and an emerging Student Housing Strategy.</p> <p>What about the World Heritage Site Management Plan? The WHS is referred to only in relation to its 'Setting'.</p> <p>The Air Quality Action Plan should also be referenced, with a link.</p> <p>Lastly, the Cotswolds AONB (CAONB) Management Plan should be referenced. The Placemaking Plan Options Document acknowledges (at para.1.141) that the University of Bath campus lies partly within the CAONB. Emerging Policy Approach SB26 (page 56) calls for future development at the University to 'respond positively and sensitively to the CAONB designation'. As well as helping protect part of the city and its setting at Claverton Down from inappropriate development, the CAONB designation extends well within the city boundary in other locations, notably into Widcombe - where it penetrates to within half a mile of the city centre. The Placemaking Plan acknowledges (at para.2.221) that AONBs enjoy 'the highest status of protection in relation to landscape along with National Parks', but nowhere in the document can be found any reference as to how such protection will be achieved. As a minimum, FoBRA would expect the accompanying Evidence Base to recognise (and cite) the Cotswolds Conservation Board's CAONB Management Plan as being a material consideration in deciding future planning applications.</p>
9	1.21	The Evidence Base	Ensuring that the Evidence Base includes all the right aims.	Add extra bullet: "Maintain or enhance movement and accessibility within acceptable environmental standards".
13	1.30	Central Area & River Corridor	The need for Central Bath to have a sense of Place, as for all other urban areas.	There is lack of any sense of central Bath as a place meriting consideration as a whole (as opposed to a series of development sites). FoBRA commented on this 20 Aug 13. See comments for para 1.14 above.
13	1.35	Central Area & River Corridor	See above.	This refers to three areas (the centre, the western riverside and Twerton/Newbridge). However the draft then goes straight on to the Riverside, without any consideration of the centre as a whole.
13	1.36 onwards	Bath City Riverside Enterprise Area and Masterplan	The need for traffic to and from the envisaged Enterprise Area to be planned.	The draft should recognise the fundamental connection between land use and traffic. An integrated plan for the A36 south of the river is required to support the Enterprise Area development. CIL funds should be earmarked for this.
21	1.58(S B1 –	Central Area & River	Cattlemarket traffic needs a plan.	Clearly, car parking at Cattlemarket has not been worked out. How does this square with Bath Transport Strategy?

	14c)	Corridor		
24	Design Principles SB2 Riverside E(3)	Central Riverside & Rec Ground	The Rec is a special place, subject only to the decisions of the Rec Trust, as governed by the Charity Commission.	Any thought of an option of the Rec's being used for vehicle parking needs to be queried.
30	1.73 (Option 3)	North Quays	Parking plan at North Quays	Envizages a lot of basement parking (11,300sqm). Is this a good idea?
50	1.15	Brougham Hayes Transport Depot	What is the best future for this building?	Student Housing block application made, and yet not favoured by this document.. The Student Housing sections are unimpressive. They take no account of FoBRA's paper in which credible scenarios are described which show that the demand for additional private-sector beds would greatly exceed the likely on-campus provision, thus already contravening the headline policy "to provide the majority of new accommodation on campus with off-campus provision playing a supplementary role". This needs further discussion between B&NES, the Universities and FoBRA.
51	1.126	Hartwells garage	What is the best future for this building?	Student Housing block application made, and yet not favoured by this document. [See comment for page 50 above.]
55	1.143.	University of Bath	Explanation of acronyms	GIA should be defined as Gross Internal Area.
55	1.144.	University of Bath	Establishment of credible plans at Claverton Down, and the effect these have on the city.	The campus Masterplan makes provision for up to 2,400 additional bedrooms. Only 700 have been built since 2009 (The Quads in 2014) and there are no known plans to build any more (see FoBRA paper). The argument as to whether the ultimate number should be 2,000 or 2,400 is therefore somewhat academic. FoBRA's Comments on B&NES Information Paper 'Student Numbers and Accommodation Requirements 2011-2029' dated 25 Sept 2014 (copy attached) provides more accurate figures and forecasts, and is endorsed by the University of Bath. It should therefore be adopted in place of the Council's 'Student Numbers and Accommodation Requirements' Information Paper on the B&NES website.
55	1.145/ 1.146.	University of Bath	Ditto	The 'combined effect' figures need to be explained. An increased floorspace of over 28,000 sqm relative to that approved in current policy is considered sufficiently significant to need to be accommodated in new policy, subject to the 'Environmental Capacity'.
55	1.148.	University of Bath	Ditto	Agreed.
55	1.149.	University of Bath	Ditto	Where is the 'green heart criterion' defined?

56	Emerging Policy Approach SB26.	University of Bath	Ditto	It seems odd to include 'either/or' in the floorspace options. Paras 1.140& 1.142 acknowledge the importance of considering the potential impact of future development on nearby residential areas, particularly to the south of the campus. Para.1f should therefore be amended to read "...much improved visual, landscape and amenity relationship with neighbouring land, particularly adjoining residential areas and Bushey Norwood"
56	1.152-1.156	Bath Spa University		No comment, as outside Bath
60	1.161	Local green space in Bath	Green space conservation.	It is implied in this paragraph that Bath's existing Green Open Spaces, previously safeguarded in the Local Plan (Appendix 2), will need to meet new criteria before being considered for similar designation in the Placemaking Plan. FoBRA understands that "designation" will not be appropriate for most green areas or open space [see B&NES email dated 7 Jan 15 titled "Local Green Space Designation"] and therefore proposes that all existing Green Open Spaces are automatically carried forward into the Placemaking Plan as Local Green Spaces.
72	1.194	Pixash Lane Waste Site	Bath's new recycling facility	Bath citizens will be dismayed to learn that their convenient recycling centre at Midland Road is going largely to move to Pixash Lane.
117	1.343 onwards	Rural Areas	Space and sites in the country to the east of Bath for P&R and A36/46 link.	There is a need to mention non-residential development requirements: eg (a) that the Bath Transport Strategy has confirmed the need for a P&R site to the east of Bath and that a site will need to be found; and (b) work to consider an alternative route to the A46-A36 through Bath.
171	2.6	Residential Development	Short term rentals	This section should also cover policy towards the use of properties for short-term rentals (party houses).
176	2.25-2.27	Residential Development	Student Housing policy essential	<p>Student Housing - See comments for pages 50&55 above.</p> <p>A Student Housing Policy which recognizes the increasing number of students who live, and will live, in the city is essential. It has to balance the appearance of the city, and the needs of the universities, students, residents and commerce. There are several suitable examples in Local Plans which could be modified for Bath (eg Leeds, Leicester, Loughborough and Brighton & Hove). Brighton & Hove's is written around the following Main Principles:</p> <ul style="list-style-type: none"> Effectively to support and enhance the quality and management of housing and residential environments within HMO-dominated studentified neighbourhoods, in conjunction with the recognition of the need to continue to support private sector landlords to supply high-quality student accommodation. To reduce the over-concentration of HMO in some neighbourhoods by promoting and enabling the appropriate development of purpose-built student accommodation at suitable locations within the city, that will appeal to the locational and residential preferences of

				<p>students.</p> <ul style="list-style-type: none"> • To ensure that new developments of student accommodation are well-managed, and do not impact on existing residential communities in negative ways. • To monitor the changing geographic patterns of student housing in the city and identify signs of destudentification.
179	2.35	Residential Development	Space standards	First words, delete "In response to..". After "Sept 14", delete "there are now" and substitute "proposes".
179	2.36		Space standards	Insert as first words "The Government states". After "need, and" delete "the Government states". Before "Any optional..." insert "According to the Government statements..". Delete last 6 words "(according to current Government statements)."
179	2.37		Space standards	Insert as first words "Notwithstanding, key stakeholders including..." After "space standards" add "but they remain concerned that, if these Government standards are not to be made mandatory, LPAs, developers of new property and converters and adapters of existing property will be able to continue to produce sub-standard dwellings. Moreover, they believe that the logic for the introduction of a national minimum space standard is to ensure that efficient, desirable and sustainable dwellings are produced country-wide.
179	2.38		Space standards	Substitute the following wording: "Once enabling legislation and national policy is in place, the Council will ensure that the criteria are met locally and, exceptionally, what evidence will be needed to justify any reduction of agreed specific standards. Until this point, even if it is difficult to determine what the policy would look like, the Council will begin to take measures to implement minimum space and access standards. However, it recognises that the position is likely to be clearer during 2015, to inform preparation of the draft Plan.
179	2.39		Space standards	Insert "mandatory" before "local".
184	2.56	Economic development		Not clear.
211	2.155	Green belt	Green belt removal.	Surely the Inspector has already approved Green Belt removal at Odd Down?
212	2.167	Visual amenities of the Green Belt	Eastern P&R may be incompatible with this.	Emerging policy GB1 is too sweeping: "no development within <i>or visible from</i> the Green Belt". Would that not preclude development for miles around, including within Bath? Also, it should be recognised that there may be a need for some non-residential development in the vicinity of the Green Belt, eg an eastern Bath P&R.

218	2.187	Urban Design	Evidence base documents.	The Bath Public Realm and Movement Strategy should be included in this list.
261-274	2.306-2.367	Sustainable Transport	Transport Strategy compatibility.	<p>This section should refer to the transport strategies for Bath (and Keynsham and Radstock). The Bath Transport Strategy recognises that Bath suffers from high levels of traffic and air pollution and that the intrusion of traffic needs to be reduced. The entire road network in the city suffers from air pollution above the legal limit, a fact recognised by its designation as an Air Quality Management Area.</p> <p>The Placemaking Place should also recognise explicitly the connection between development and traffic generation. The potential development sites within Bath defined in the draft plan are extensive, and development options are suggested for each area. Each option will generate traffic which will have a local impact, and there will also be an aggregate effect on the road network, with considerable traffic growth. We have yet to see any modelling of the land use options or an assessment of the aggregate impact. If such work has been undertaken, it is not reported in the draft Plan nor in the Sustainability Appraisal. The conclusion from an analysis of the consequences for traffic growth can be either to plan for the additional growth, or conversely, to reconsider the development options and plan for less intensive use of the land. The Placemaking Plan needs to address this issue fairly and squarely, and to make it clear that, even though all these sites have been identified as in principle suitable for housing development, before any permissions are granted there must be proper studies of their traffic impact on the whole city and its distributor roads, and their availability for development must be held back until any work necessary to improve highways, public transport or traffic management has been planned, funded and committed. We propose below suggestions to strengthen this section of the Plan.</p>
261	2.307	Sustainable Transport	Transport Strategy compatibility.	Add a new policy aim: "To reduce traffic congestion and air pollution and the intrusion of vehicles in urban areas". (This is based on Policy GABP5 of the Bath Transport Strategy).
262	2.309	Sustainable Transport		<p>Insert new paragraphs after para 2.309:</p> <p>2.310 The Bath Transport Strategy recognises that Bath suffers from high levels of traffic and air pollution and that the intrusion of traffic needs to be reduced. The entire road network in the city suffers from air pollution above the legal limit, a fact recognised by its designation as an Air Quality Management Area. [Keynsham, Radstock etc]</p> <p>2.310 The development options considered in this Plan will generate additional traffic and there will also be an aggregate effect on the road network. The impact in each area, and the aggregate impact on the road network of the options put forward, will be assessed as part of the ongoing work stemming from this Plan and the Transport Strategies for Bath and other urban areas. Development of these sites will not proceed until any work necessary to improve highways, public transport or traffic management has been planned, funded and committed.</p>
262	2.310 ST1	Sustainable Transport	Transport Strategy compatibility.	Add to point 1 after 'traffic management' <i>and parking control...</i>
264	2.316-	Sustainable	Transport Strategy	This Section should refer to the Bath Transport Strategy, which has confirmed the need for a P&R to

	2.319	Transport	compatibility.	the east of Bath and the need to consider alternatives to the A46-A36 route through Bath for HGV.
265	2.325	Sustainable Transport	See comment for p17, above.	Should propose an integrated plan for the Lower Bristol Road and the Enterprise Area development, making use of CIL funds.
266	2.328& ST3	Sustainable Transport	Transport Strategy compatibility.	Needs to be read with an A36-A46 link in mind and so that such a link is not precluded by this policy. This section needs to refer to the intention stated in the transport strategy to look at alternative routes for HGV currently using Bath.
268	2.333	Sustainable Transport	Transport Strategy compatibility.	Should mention the aim in the Bath Transport Strategy (and the other towns if appropriate) to reduce traffic and to develop a traffic management plan accordingly.
268	2.334 ST5	Sustainable Transport	Transport Strategy compatibility.	Generally satisfactory, but ignores the fact that, in Bath at least, the main shopping streets are mixed up with residential accommodation.
269	2.335	Sustainable Transport	Transport Strategy compatibility – P&R policy	The P&Rs should operate until late for 7 days a week, with secure overnight parking. That would enable their use by evening visitors and those staying overnight, who cannot currently use them. There should be a shuttle service of suitable vehicles for overnight visitors, serving the hotels and guest houses.
269	2.337 ST6	Sustainable Transport	Transport Strategy compatibility – P&R policy	ST6 point 1 is basically meaningless. Clearly one cannot accept the unacceptable, and anyway this does not define what is 'unacceptable': unacceptable to whom, and on what criteria? There is no recognition of the necessity to strike a balance between the need for a P&R to help protect the environment of Bath and the need to minimise harm to the environment to the east of the city. Suggested revision:"a. Development can be shown to be in the public interest, taking into account the need to protect the Bath World Heritage Site by reducing traffic intrusion, and the potential impact on environmental assets and amenity including the setting of Bath and the Cotswolds AONB".
270	2.338	Sustainable Transport	Transport Strategy compatibility	The first mention of the Bath Transport Strategy!
271	2.343 ST7	Transport access and development management	Transport Strategy compatibility – pollution policy	<p>B&NES' current Local Plan states, under policy ES10, that development will not be permitted where it would:</p> <ul style="list-style-type: none"> • Have an adverse impact on health, the natural or built environment or amenity of existing or proposed uses by virtue of odour, dust and/or other forms of air pollution, or • Be likely to suffer unacceptable nuisance as a result of proximity to existing sources of odour, dust and/or other forms of air pollution. <p>This policy should be saved in ST7. This is entirely the wrong time to weaken policy on air pollution related to development. ST7 was a material factor in the Inspector's rejection of the Tesco appeal on the Bath Press site.</p>

Robin Kerr, FoBRA Chairman

Final – 23rd Jan 15