

7<sup>th</sup> January 2019

Planning Policy  
Bath & North East Somerset Council  
Lewis House  
Manvers Street  
Bath BA1 1JG



By email only to [local\\_plan2@bathnes.gov.uk](mailto:local_plan2@bathnes.gov.uk)

Dear Sir / Madam

## **BATH AND NORTH EAST SOMERSET LOCAL PLAN OPTIONS CONSULTATION**

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the Options consultation for the Bath and North East Somerset Local Plan ('the Plan').

The Board's main objectives in responding to this consultation are to ensure that:

- the local planning authority (LPA) fulfils its statutory duty to have regard to the purpose of designation of the Cotswolds Area of Outstanding Natural Beauty (AONB) (i.e. to conserve and enhance the natural beauty of the Cotswolds AONB) when developing the Plan; and
- the Plan makes a positive contribution to:
  - conserving and enhancing the natural beauty of the Cotswolds AONB;
  - increasing the understanding and enjoyment of the special qualities of the Cotswolds AONB.

With regards to the proposed policy approach / options that are set out in the consultation document, our response can be summarised as follows.

**SS1 – SS3 (Options 1-3):** Option 1 is the Board's preferred option as this would result in the least amount of housing development in the Cotswolds Area of Outstanding Natural Beauty (AONB). Option 3 is the Board's least preferred option. In particular, we are concerned that Option 3 specifically promotes opportunities around the edge of Bath. Given that Bath is surrounded on three sides by the Cotswolds AONB, this options leaves the AONB the most vulnerable to new housing development. Our response to SS3 (Option 3) provides further guidance on how the AONB should be taken into account, including consideration – at the plan-making stage - of the extent to which potential allocations in the AONB would constitute 'major development'.

## **BTH2 / BTH7 / BTH9 / BTH10 / DM2**

In response to these policy approaches / options, the Board states that the LPA should ensure that it:

- fulfils its statutory duty to have regard to the purpose of AONB designation;
- complies with the policies of the National Planning Policy Framework that relate to AONBs (primarily paragraph 172);
- sets policies and identifies and allocates sites in a way that is consistent with the policies of the Cotswolds AONB Management Plan and associated guidance produced by the Cotswolds Conservation Board ('the Board').

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

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The Board's response also highlights the relevant Landscape Character Types (LCTs) for each of these policy approaches / options, where appropriate, and the need to have regard to the Board's Landscape Character Assessment and Landscape Strategy and Guidelines for these LCTs.

The Board's response to these policy approaches / options also highlights the fact that the consultation document extensively refers to the 'exceptional circumstances' that relate to removing land from – and allocating sites in – the Green Belt but makes no mention of the 'exceptional circumstances' that relate to major development in AONBs. The Plan should give at least equal weight to the 'exceptional circumstances' that apply to AONBs as it does to the 'exceptional circumstances' that apply in the Green Belt.

The Board's full response is provided in the attached Comments Form.

If you have any queries regarding the Board's response, please do not hesitate to get in touch.

Yours faithfully,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

John Mills MRTPI  
Planning and Landscape Officer