



Chris Griggs-Trevarthen
Bath & North East Somerset Council
Planning Services
Lewis House
Manvers Street
Bath
BA1 1JG

By email only to: chris_griggs@bathnes.gov.uk

29 September 2022

Dear Chris,

APPLICATION NO: 22/02169/EOUT

DESCRIPTION: (i) Outline application for Phases 3 and 4 for up to 300 dwellings; landscaping; drainage; open space; footpaths and emergency access; all matters reserved, except access from Coombe Hay Lane via the approved Phase 1 spine road (details of internal roads and footpaths reserved); (ii) Detailed application for the continuation of the spine road (from Phase 1), to and through Sulis Manor and associated works comprising: the demolition of existing dilapidated buildings and tree removal; drainage; landscaping; lighting; and boundary treatment; to enable construction of the spine road, and (iii) Detailed application for landscaping; mitigation works; allotments; including access; on the field known as Derrymans.

LOCATION: Parcel 4234 Combe Hay Lane Combe Hay Bath

Further to the Cotswolds Conservation Board's ('the Board') previous consultation response to this application, dated 4 August 2022, we wish to make some further comments relating to housing need and the need for this development following the publication of the Inspector's letter on the Examination of the Bath and North East Somerset Council Local Plan (Core Strategy and Placemaking Plan) Partial Update. We would be grateful if these comments are read as an addendum to our previous response.

In paragraphs 7-15 of his letter dated 11 August 2022, the Inspector discusses the supply of housing within Bath and North East Somerset. He concludes at paragraph 15 by stating that *"Having considered the housing land supply evidence, I am minded to conclude that there will be a five-year supply of deliverable housing sites on the adoption of the Plan and that given the extent of the housing land supply as a whole, there would also be adequate provision of specific, developable sites for the remainder of the plan period to 2029. I am also of the view that this would be the case even if I did not take the past over-supply into account"*.

The Council's trajectory calculation, which forms part of the evidence base supporting the Local Plan Partial Update, includes the 171 dwellings granted permission on this site in 2019 and anticipates a further 50 dwellings being delivered by the end of the current 5-year period in 2026/27 on the remainder of the site. Indeed, Appendix D of the Council's Written Statement relating to Matter 3 of the LPPU examination ([link](#)) lists a capacity of 129 dwellings from future phases of the B3a Odd Down allocation to give an overall total of 300, rather than the 300 proposed by this application which would result in a total of 471.

Cotswolds Conservation Board

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The Cotswolds National Landscape is a designated
Area of Outstanding Natural Beauty (AONB),
managed and looked after by the Cotswolds
Conservation Board.

cotswoldsaonb.org.uk

Chairman:
Brendan McCarthy

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Rebecca Charley

The Inspector's conclusions align with the Board's view as expressed in our response of 4 August 2022 that there is no need for this site, which lies within an AONB where national policy states that the scale and extent of development should be limited, to deliver anything above the total of 300 homes it is indicatively allocated for in the Core Strategy.

Therefore, the Board wishes to reiterate our **objection** to this application for the reasons outlined in our previous response.

Please don't hesitate to contact me if you wish to discuss this or our previous response further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Joyce', with a small dot at the end.

Simon Joyce

Planning Officer

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