

20 September 2023

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VIA EMAIL ONLY

Dear Chris

**SOMER VALLEY ENTERPRISE ZONE (SVEZ) LOCAL DEVELOPMENT ORDER (LDO) – REF. 23/0076/LDO
RESPONSE TO CONSULTATION FEEDBACK**

Further to submission of the above on 16th January 2023 and review of the feedback received via the subsequent consultation exercise, we are pleased to provide, on behalf of Bath and North East Somerset Council ('the Council') (B&NES) a formal response to the substantive issues raised.

This response is made in the interests of continued positive and proactive management of the draft Local Development Order (LDO). The Council understands that a further consultation exercise ('re-consultation') will be undertaken by the Council's Development Management (DM) team (the local planning authority) (LPA) upon receipt of this submission for a period of 4 weeks.

Under Article 38 (10) of the Town and Country Planning (Development Management Procedure) 2015, following the LDO Publicity, the local planning authority must, in considering what modifications should be made to the draft LDO or whether such an order should be adopted, take into account any representations made in relation to that order. This response, along with the updated and amended drawings and technical studies, have been prepared in order to assist this process.

The Council has sought to engage pre-emptively with the various consultees as part of the development of the LDO to ensure delivery of a mutually agreeable solution in respect of the matters raised. Focussed discussions have taken place with several consultees following the close of the initial consultation exercise and have proved useful in distilling the salient issues and settling the Council's final position.

Context

The LDO was validated on 13 January 2023 and the initial consultation period commenced 16 January 2023. The consultation period concluded on 23 February 2023. The Council has reviewed and considered the comments raised, as provided by the DM team and as published on the Public Access portal and, where considered necessary and appropriate, have made amendments to the draft LDO.

Comments were received from the following consultees:

- B&NES and C S (Environmental Monitoring) – Air Quality
- Arboriculture
- Archaeology
- The Coal Authority
- Conservation Officer
- B&NES Drainage and Flooding Team (LLFA)
- Ecology
- Environmental Protection

- Natural England
- B&NES Transportation and Highways
- Historic England
- National Grid
- Paulton Parish Council
- Ston Easton Parish Council
- Farrington Gurney Parish Council
- B&NES Planning Policy
- B&NES Public Rights of Way (PRoW) Team
- Urban Design and Landscape – Neil Williamson Associates
- Wales and West
- Wessex Water

Of those responses the following parties raised objections and/or clarifications necessitating a further response and/or revisions to the submitted design of the LDO:

- a. Arboriculture
- b. SW Heritage Trust (Archaeology)
- c. Conservation Officer
- d. Ecological Officer
- e. Environmental Protection (Noise)
- f. Transportation and Highways
- g. Urban Design and Landscape – Neil Williamson Associates.
- h. Public Rights of Way
- i. B&NES Drainage and Flooding Team (LLFA)

In addition to the comments raised by consultees, feedback was also received from members of the local public. This feedback has also been considered by the team. A Statement of Clarification has been prepared which provides responses back to common and frequently raised questions and comments raised by the public.

Response to Consultee Feedback

Turning to the consultee feedback, this letter sets out the Council's position in respect of the matters raised by consultees (a) – (i) above. This letter sets out responses to comments made and/or identifies where amendments have been made to the draft LDO and supporting technical studies in order to incorporate the feedback received. Where appropriate the below responses cross-reference to updated or amended technical studies that form an integral part of the LDO. The package of information provided should be read as a whole, and a balanced assessment made accordingly by the LPA.

An overview of the main design amendments to the draft LDO are outlined below:

- Structural boundary planting depth has been enhanced through increased density of planting and removal of part of the perimeter footpath. Subsequently, the landscaping strategy section within the Design Code has been updated to provide further information on density mixes and illustrative sections of the proposed structural boundary planting.

- Update to the Phasing plan to enable the delivery of structural boundary landscaping as part of Phase 1 of the development.
- Amendment to road layouts / details including key dimensions, level information, boundary details.
- Agricultural access road between P9 and P11 incorporated to provide access to the fields to the north.
- The LDO drawings have been updated to clarify the extent of footway only routes which are along existing public footpaths and new routes which will be footways and cycleways.
- Parking strategy updated to reflect the recently adopted Transport & Development SPD.
- In light of the design updates to the layout, the plot areas for plots 1, 2, 3, 4, 7, 9, 10, 11 and 12 have been updated. The building floor areas remain unchanged.
- To address comments raised by an adjacent landowner, a 3m acoustic fence is proposed to the west of Plots 5 and 6 along the LDO boundary.
- Conditions in the Statement of Reasons have been updated including additional conditions to address feedback for consultees and interested parties. For example, condition 29 addresses impacts from construction noise and condition 31 to addresses hours of the operational uses permitted.

Set out in the below schedule are the responses to pertinent issues raised by the consultees (a) – (h) above.
 Table 1.0 Council Response

	Consultee	Summary of Comment	Response
a	Arboriculture	<p>The proposed dark corridors for bats should be 20m to allow for several tree planting rows to contribute towards robust continuous canopy cover as part of the strategic green infrastructure.</p> <p>The planting and establishment of the strategic landscaping should form part of Phase 1.</p> <p>Footpaths should not be placed beneath the canopies and within the root protection areas of the A category trees.</p> <p>The indicative access road and building within P12 could be moved north to accommodate a footpath beyond the influence of trees.</p> <p>Of the three trees categorised as A class trees, identified as T3, T14 and T20 all have their root protection areas compromised by hard surfacing and footpaths. The footpaths are beneath the canopies of these trees and the change of use is likely to alter their management over time. This is avoidable and the layout amendments are necessary.</p>	<p>The illustrative masterplan and other material such as the landscaping strategy section within the Design Code (containing further information on density mixes and illustrative section) and photomontages have been revisited to address concerns raised by the Arboricultural Officer and associated comments from the Urban Design and Landscape consultee.</p> <ul style="list-style-type: none"> • The structural boundary planting/ecological buffer zones are 15m in most places and 20m adjacent to the SNCI. The illustrative masterplan includes more detailed structural boundary planting and removal of the circular footpath. The structural boundary planting depth has been enhanced through increased density of planting within these areas which will ensure continuous canopy cover. • The phasing plan for the LDO has been amended so that the structural boundary planting forms part of Phase 1. • The footpath has been removed from the structural boundary planting area on the western and northern boundaries. In terms of T20, moving the footpath outside of the RPA would encroach into the structural planting shielding the building on Plot 10 from the green corridor resulting in a loss of tree and landscape planting in this area Furthermore, moving the footpath would mis-align the path across the spine road. Doing so would be detrimental to the pedestrian wayfinding and legibility. • Whilst there are still footpaths in the RPA of category A trees on site, the encroachment into the rooting

			<p>environment of these trees can be mitigated through protective measures during construction and proposed resurfacing works comprising of a no-dig, load bearing system in accordance with best practice guidance.</p> <ul style="list-style-type: none"> • The access road has previously been moved south to avoid impacts on category A tree T003. The use of P12 is likely to require a circular vehicular loop around the building for access and egress, whilst maintaining movement zone requirements for vehicles within the parking area. Moving the access road would result in a parking area below the required quantum. • Further the illustrative Masterplan shows a ‘no build zone’ due to existing power lines which restricts where the building can move to and thus dictates site layout for plot 12. • The site has been redesigned to remove the footpath which was proposed through most of the structural boundary planting area. However, there are still footpaths within the root protection area of these three trees’ RPA. As noted above, suitable mitigation exists in the form of no-dig construction methods in accordance with best practice guidance to address impacts of encroachment into rooting environments. Furthermore, it is proposed to plant over 10,000 new trees which will significantly increase the extent of tree cover on site. <p>Please also refer to Ecological response at (d) below and updated ecology reporting.</p>
b	SW Heritage Trust (Archaeology)	<p>Level of information supplied concerning archaeology is limited.</p> <p>Archaeology is of local significance with potential to inform the wider context of</p>	<p>The LDO would be supported by an Overarching Archaeological Mitigation Strategy, the wording of which would be agreed with the B&NES Archaeological Advisor (South West Heritage Trust) as part</p>

		<p>Middle Bronze activity in Somer Valley and environs.</p> <p>The key document is the sitewide Framework Mitigation Strategy (FMS) as this is the overarching specification for all subsequent archaeological investigation, analysis and publication of results for the site. This document must include details such as how the results of all the follow-on investigations on the site will be presented in a single publication. This is important as it is likely individual plots (and areas outside of plots) will be subject to excavation at different times and individual developers may put forward plot mitigations prepared by their preferred archaeological contractor.</p>	<p>of a pre-commencement planning condition. The Overarching Mitigation Strategy would outline the nature and extent of any further evaluation requirement (once land access is obtained), including geophysical survey, and the nature and extent of any archaeological mitigation works (if required) for each plot, based on the findings of the evaluation investigation. This would be agreed in consultation with the B&NES Archaeological Advisory.</p>
c	<p>Conservation Officer</p>	<p>Heritage DBA incorrectly identifies heritage assets.</p> <p>Further field evaluation is required to complete the full assessment of the proposed Highways works.</p> <p>Proposals will negatively impact on the setting of Springfield Buildings and the entire site that was once known as Old Mills Colliery that contains the Batch. Road works are of particular concern.</p> <p>Proposal will substantially harm the setting of non-designated heritage assets.</p> <p>Cross sections across the site are needed to provide a better understanding of impact.</p> <p>Clarification is required to ensure that the road works proposed at Areas C and D can be altered to allow retention of the Colliery boundary walls and other features along the road close to Springfield Industrial Estate.</p> <p>Little space to buffer any of the proposed units and to allow the rural character of the landscape to predominate.</p> <p>Harm will be in the order of substantial harm to the setting of both Springfield Buildings and Old Mills Colliery.</p>	<p>The Heritage Desk-Based Assessment (DBA) has been updated to include additional detail on the significance (including their setting) of heritage assets referred to by the Conservation Officer (CO), consider the impact of proposed highways work, the plans for which were not available at the time of the previous submission and to consider additional photomontage of views towards the Batch from Springfield buildings.</p> <p>A Statement of Significance provides further detail on the non-designated Springfield Buildings and The Batch, which will form an appendix to the DBA. A more detailed assessment of the impacts arising from the Proposed Development will be provided in the updated DBA, considering the CO's comments. The updated impact assessment has been informed by additional photomontage work carried out by Arcadis' Landscape Planning team, as requested by the CO.</p> <p>The stone boundary wall of Old Mills Colliery immediately north of the A362 (approx. NGR ST653550) would be retained in its current condition. The stone boundary wall immediately south of the A362 (approx. NGR ST651549) would be</p>

			<p>retained in its current condition. No works are proposed to either feature. The proposed development is to be designed and constructed in accordance with best practice guidance and standard mitigation employed within the construction and built environment. The Contractor can provide appropriate fencing and hoarding as may be necessary to protect cultural heritage assets adjacent to the construction site.</p> <p>As discussed with the CO, "Substantial harm" is a policy test applied to Designated Heritage Assets, non to Non-Designated Heritage Assets which is the case here. The heritage DBA methodology has been updated to more clearly articulate the level of significance of heritage assets and level of harm throughout, with reference to the "Principals of Cultural Heritage Impact Assessment in the UK" (2001:CIfA, IMEM and IHBC).</p> <p>This Heritage Statement including the supporting Statement of Significance provides evidence to enable the significance of the heritage assets (including the contribution made by their setting) and the scale of harm to be understood. The proposed development would result in the complete removal of one non-designated heritage asset of medium significance (Prehistoric/Roman settlement), moderate harm to one non-designated heritage asset of medium significance (the Batch) as a result of change to its setting, low harm to a Late Medieval historic landscape of medium significance due to a physical impact, minor harm to four non-designated heritage assets of low significance (Old Mill Colliery and three groups of workers cottages) as a result of changes to their setting, and complete removal of one non-designated heritage asset of negligible value (trace ridge and furrow earthworks).</p> <p>The harm identified to these non-designated heritage assets of medium, low and negligible significance should be weighed against other material considerations in the balanced judgement</p>
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			<p>of the application as a whole, as required by paragraph 203 of the NPPF.</p> <p>Turning to the countervailing material considerations, these are as follows:</p> <ul style="list-style-type: none"> - Delivery of a sustainable mixed-use employment led development providing new amenity areas and landscaping. - Direct economic investment including job creation. - Delivery of a scheme that successfully contributes and compliments the wider Enterprise Zones in Bristol and Bath. - Deliver a range of complimentary amenity spaces to enhance workers experience which can also be used by the general public. - Creation of new footways, cycleway and delivery of highways improvements <p>It is considered that the loss to the significance of the impacted non-designated heritage assets associated with this application will be offset by the important material considerations and benefits of the scheme as set out above and also in the accompanying Statement of Reasons. This satisfies the policy test in the National Planning Policy Framework, paragraph 203.</p>
<p>d</p>	<p>Ecological Officer</p>	<p>Scheme cannot be approved without a solution to address the shortfall in the calculated net loss of biodiversity.</p> <p>If substantive off site solutions continue to be required these will need to involve habitat creation schemes to replace habitats being lost.</p> <p>Revisions to achieve a reduction in calculated net loss would be welcome.</p> <p>Accurate plans showing proposed habitat areas, access paths and other features at a more detailed scale are needed.</p>	<p>Concerns relating to Biodiversity Net Gain (BNG) on site have been addressed by a site redesign which has reduced the percentage BNG loss to -24.81% (see BNG report 10042920-AUK-XX-XX-RP-EC-0020-07). This has been achieved through the addition of woodland habitats on site and the removal of footpaths from most of the perimeter of the site. The Landscape Component Areas plan (10042920_ARC_XX_XX_DR_LA_P1) has been used in the BNG calculation. The hedgerow identified as H2 in the arboricultural report requires removal for development of the site to be viable. It is proposed to enhance adjacent hedgerows</p>

		<p>Proposed removal of hedgerow (H2) is not accepted – proposed removal not justified or in accordance with requirements for BNG.</p> <p>Missing survey information.</p> <p>Request for additional detail and mapping to show locations of higher botanical interest.</p> <p>Bat flight routes and habitat connectivity.</p> <p>Multiple uses and proposed footpaths or other infrastructure within bat flight routes/habitat connectivity zones and beneath tree or hedgerow canopy is not acceptable and may also impact on BNG.</p> <p>Lack of clarity regarding replacement planting and retention of connective green infrastructure.</p> <p>All proposed lighting (including lamp models and positions) should be detailed at a later stage or full details of light spill modelling provided/first demonstrate adherence to submitted Lighting Strategy</p>	<p>and plant a new species-rich hedgerow in the northeast of the site to mitigate for the loss of this hedgerow. Most of the hedgerows on site will be retained as part of the design.</p> <p>The location and extent of areas of marginally higher botanical interest within the field labelled F1 has been clarified within the baseline report (10042920-AUK-XX-XX-RP-EC-0002-05). These patches of grassland were limited in extent and the coverage of the ‘additional’ plant species limited. The overall assessment of the field is species-poor semi-improved. Access to the field labelled F2 has not been possible, the precautionary principle has therefore continued to be employed with respect to the potential ecological value of the grassland community in this field.</p> <p>While structural boundary planting widths have not been increased, the habitat proposed for the boundary planting areas has been changed to woodland and the density of planting increased. This will enhance the habitat suitability for wildlife including for bats. The proposed footpaths in these areas have largely been removed, increasing the area available for planting. The habitat management plan (10042920-AUK-XX-XX-RP-EC-0019-06) details how this habitat will be managed to ensure trees have enough space to grow.</p> <p>Highways drawings show road verge habitats which will be replanted as amenity grassland as is consistent with the road verges already present on site. Hedgerows will be replaced, where possible, with species rich hedgerows which are of higher quality than the existing species poor defunct hedgerows in the areas proposed for highways works, as detailed in the BNG report (10042920-AUK-XX-XX-RP-EC-0020-07). The loss of trees and woodland within the highway intervention areas will be mitigated by the planting of 1.84 ha of woodland and 430 individual trees within the main site which is adjacent to the area of woodland to be lost in the highways site.</p>
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			<p>This woodland will be of a greater diversity and will be managed so that over time it is of better quality than the exiting woodland that is to be removed. These measures will maintain green infrastructure connectivity in this area.</p> <p>A sensitive lighting strategy has been produced for the site.</p> <p>The site will be subject to a habitat management plan. This regime will provide opportunities to optimise the biodiversity value of these habitats.</p> <p>A BNG technical note has been prepared which provides commentary on the potential mechanism by which a solution to address acknowledged biodiversity loss can be secured.</p>
f	<p>Environmental Protection (Noise)</p>	<p>The Baseline Noise Survey and Assessment Report has determined appropriate plant noise limits (-5dB below representative background noise level) in accordance with British Standard 4142. These limits are detailed in Table 6-1 p.27 and should be adhered to in respect of any future plant which may be installed. Any future installations should be accompanied by an appropriate noise assessment from a competent person to demonstrate compliance with the limits. It is important to note that with increasing occupation of the units and with additional plant, the cumulative level of noise will naturally increase perhaps making it difficult for new installations to comply.</p> <p>There is predicted heavy vehicle noise impact at Fernleigh and mitigation in the form of a 4m high acoustic fence is proposed to address this in Figure 7.5 p35. Further detail on the construction of the noise barrier should be provided along with ongoing commitment to maintain its performance. With the proposed barrier in place, the impact of HGV noise at this location is appropriately mitigated.</p>	<p>Condition 16 (noise) outlined in the draft LDO and Statement of Reason has been updated to require noise emissions from installed plant to be at least 5dB below measured background levels as outlined in the supporting Noise Assessment.</p> <p>Each Compliance Application will be supported by a noise assessment of the installed plant in accordance with BS4142: 2014 Method for Rating and Assessing Industrial and Commercial Sound.</p> <p>This condition will demonstrate that noise emissions from installed plant including any necessary mitigation measure shall be at least 5dB below measured background levels as outlined in the supporting Noise Assessment (January 2023 Rev P01).</p> <p>The Compliance Application for Plot 12 will be supported by a noise assessment which will consider noise generation from fixed plant and on-site operational vehicle movements within the Plot 12 boundary. This submission would also outline the details of any necessary mitigation measures, such as the construction and maintenance details of any required noise barrier.</p>

		<p>The impact of construction works need to be appropriately predicted and evaluated in accordance with British Standard 5228 - 1.2009+A1:2014 Code of Practice for noise and vibration control on construction and open sites. Working hours in respect of noise should also comply with the Council's Code of Practice, broadly limiting such work to Monday - Friday (0800 - 1800) and Saturday (0800 -1300).</p>	<p>Noise impact during the construction phase will be temporary in nature.</p> <p>Condition 29 (Construction Noise) outlined in the draft LDO and Statement of Reasons will require that each Compliance Application will be accompanied by a noise and vibration management plan which will outline best practice construction methodologies and approaches which aim to reduce noise and vibration emissions as far as is practicable.</p>
g	Transportation and Highways	<p>Various detailed comments</p>	<p>Arcadis' Transport Planning team have been in direct dialogue with B&NES Highways Development Management (HDM) team to address the detailed comments and queries raised in relation to the original LDO submission.</p> <p>A Transport Assessment Addendum has been prepared which provides additional information and clarifications where necessary to supplement the submitted TA. This includes revised proposed highways general arrangement drawings.</p> <p>A summary of comments/responses is provided below:</p> <ul style="list-style-type: none"> - Clarification that the highways general arrangement drawings are fixed elements of the LDO that would take precedent over the illustrative masterplan. - Estate road is to be built to adoptable standards however it would not be offered up for adoption. - The proposed development would comply with the adopted parking standards. Parking provision to be agreed for each plot under compliance submissions. - The potential for a car club operator to serve the site would be explored through occupier-specific travel plans.

			<ul style="list-style-type: none"> - Clarifications provided in respect of trip generation and traffic modelling. - Swept path analysis undertaken to demonstrate suitable access for HGVs, refuse and recycling / servicing. - Confirmation on approach to Travel Planning. Developer to retain responsibility for implementing the Travel Plan with individual occupiers responsible for implementing their Travel Plans. - Additional details (key dimensions, level information, boundary details and road sign strategy) added to highways drawings. - Works along the A362 at Sunnyside, SVEZ site access roundabout / adjoining link road, pedestrian/cycleway (site to Thicket Mead) and Thicket Mead roundabout are proposed to be adopted by BANES. <p>Appendix A of the TA Addendum provides a detailed schedule which outlines HDM comments and the applicant's detailed response.</p>
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<p>g</p>	<p>Urban Design and Landscape – Neil Williamson Associates.</p>	<p>Various comments received relating to:</p> <p>Phasing and delivery of strategic landscaping.</p> <p>Required revisions to supporting documentation.</p> <p>Status of illustrative masterplan.</p> <p>LVIA/efficacy of proposed landscape mitigation particularly the width of the proposed landscape buffers.</p> <p>Hedgerow removal.</p> <p>Status of perimeter footpath.</p> <p>Scale and detail to plans.</p> <p>Biodiversity Net Gain (BNG)/landscape component areas as shown on Strategic Landscape Plan.</p>	<p>The phasing plans have been updated so that the proposed structural boundary planting takes place within Phase 1 of the works which will allow it to establish and mature earlier than it would if it was implemented once all the built development was completed. This is described within the updated LVIA (Revision 06) and shown on the Phasing Plan - SVEZ-AHR-MP-ZZ-DR-A-92-018 – P07. It should be noted that buildings are unlikely to be constructed until years 2-3 after enabling works, with the more northern buildings later still (year 5 onwards) which means, the structural boundary planting will be more mature than described in the LVIA (assessed as Year 1) and shown on the illustrative material (sections and photomontages).</p> <p>In terms of addressing the structural boundary planting, we have undertaken the following:</p> <ul style="list-style-type: none"> • The proposed footpath has now been removed from the northern and western boundaries which allows for denser planting within these areas. This is as shown on Illustrative Masterplan - SVEZ-AHR-MP-ZZ-DR-A-92-015 – P33. • We have provided more detail on the density of planting that can be achieved within the structural boundary planting with planting mix suggestions and illustrative sections (Landscape Strategy within the Design Code - SVEZ-AHR-MP-ZZ-PR-A-A3-002 – P12) • The photomontages have been amended accordingly to show a denser planting mix at Years 1 and 15 as illustrated in Figure 8 the LVIA.
<p>h</p>	<p>Public Right of Way</p>	<p>The plans accompanying the application do not accurately show the definitive line of footpaths CL16/48 and CL16/51.</p>	<p>The public footpaths on the proposed site have been incorporated unaltered into the site design. The LDO drawings have been updated to show the definitive lines of relevant Public Rights of Ways within and adjacent to the site.</p>

		<p>Public footpath CL16/48 is shown crossing an estate road. Where the footpath crosses the proposed estate road, there must be demarcation of the footpath on the ground. Vehicles must give way to pedestrians.</p> <p>Distinction must be made between the new routes where cycling is permitted and the existing public footpaths where cycling is not permitted.</p>	<p>Highways General Arrangement Sheet 4 of 6 (Drawing Ref. 10042920-ARC-HGN-ZZ-DR-HE-0005) details an uncontrolled crossing point for continuation of the public right of way CL16/48 which is shown crossing a proposed estate road.</p> <p>The LDO drawings have been updated to clarify the extent of footway only route i.e., existing public footpaths and new routes which will be footways and cycleways.</p>
i	<p>B&NES Drainage and Flooding Team (LLFA)</p>	<p>Drainage Strategy Report proposes a greenfield discharge rate of 53.9 l/s (based on 6.73 l/s/ha QBar rate) to the Wellow Brook which is acceptable in principle. However the Drainage Layout Sheets shows a different peak rate of 61.8 l/s (final flow control in SWMH15). Are there any uncontrolled connections proposed downstream of the last flow control?</p> <p>Climate change allowance is variable depending on the lifetime of the development. A allowance of 40% has been used which equates to a development lifetime of up to 2060. If the development has a lifespan beyond this then the 45% allowance should be used. Please confirm.</p> <p>Report is not clear regarding the status of the surface water sewer receiving flow from the development as it gives the impression that there is an existing public sewer which is to be connected to, this is not the case. It appears that a new public sewer is being proposed.</p> <p>Drainage drawings should confirm the proposed status of the surface water drainage (public where being adopted by Wessex Water, private if not)</p>	<p>The total greenfield discharge rate has been corrected on the report / drawing and is now consistent – 58.8l/s. The total impermeable area is 7.11ha for the parcels (which are attenuated on plot) and 1.62ha for the road (which is attenuated in the basin at the site entrance). There is no new impermeable areas that connects to the proposed pipe network downstream of the proposed attenuation features.</p> <p>Climate change has been checked at 45% and can be accommodated within the current design. The Microdrainage calculations and report (section 6.3) have been updated appropriately.</p> <p>It is confirmed that the new site will connect into existing watercourses, not existing public sewers and the report has been updated to reflect this (section 5).</p> <p>It is anticipated that the onsite drainage will be adopted by Wessex water when it drains more than 2 curtilages, and the drawing has been updated to clarify this (section 5, and 8).</p>

		<p>Clarification of who will be responsible for maintaining the various drainage elements is required.</p> <p>Some drainage detail on the drawings is obscured by the red line.</p> <p>Source Control calculations have been provided for each plot. These calculations show each plot as having a flow control, this is not shown on the drainage layouts</p> <p>A full MicroDrainage model (System1) of the proposed surface water network is required to prove the performance of the system as a whole</p> <p>Exceedance routes need to be shown on a plan. Particularly important where attenuation is being proposed adjacent to existing properties.</p> <p>Location of flow controls should be carefully considered to ensure that they can be accessed easily for inspection and maintenance. Locating them on roads/access roads will be problematic. The preference where possible is for the flow controls to be included in the adoption by Wessex Water.</p> <p>The design code needs to expressly state that each plot is to comply with the details set out in the Drainage Strategy.</p>	<p>The maintenance schedule has been updated to clarify responsible parties, and a section added to the report to summarise this (section 8).</p> <p>The drawing has been amended to ensure these items are no longer obscured.</p> <p>Labelling of the flow control has been added to the drawings for clarity.</p> <p>The Microdrainage model has been added to the appendix of the report alongside the storage calculations</p> <p>Overland flow routing has been added to the drawing to show where water will naturally migrate in exceedance events.</p> <p>Notes to this affect have been added to the report and the detailed design of the parcels will look to locate controls where safe to access without traffic management (section 6.2.16, and 8)</p> <p>Condition 13 outlined in the Statement or Reason requires each plot to provide details of the proposed surface water drainage design in accordance with the sitewide drainage strategy prior to the commencement of the relevant development. In addition, the compliance checklist (outlined in the Design Code) for future Compliance Applications includes a requirement to demonstrate compliance with the SuDs drainage strategy.</p>
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Submitted Information

Table 2.0 below summarises the updated and revised information submitted to respond to the concerns raised.

Table 2.0 Submitted Information

Document/Plan	Document Reference	Version	Revision / Version	Produced By	Date
Local Development Order 2023 & Statement of Reasons	September 2023	n/a		JLL	Sept-23
Design and Access Statement	SVEZ-AHR-MP-ZZ-PR-A-A3-001-LDO DAS		P19	AHR	May-23
Design Code	SVEZ-AHR-MP-ZZ-PR-A-A3-002 LDO Design Code		P12	AHR	May-23
Statement of Clarification	May 2023	n/a		B&NES	May-23
Site Opportunities	SVEZ-AHR-MP-ZZ-DR-A-92-01-003		P08	AHR	May-23
Proposed Plot Boundaries	SVEZ-AHR-MP-ZZ-DR-A-92-010		P09	AHR	May-23
Proposed Masterplan - Fixed Elements	SVEZ-AHR-MP-ZZ-DR-A-92-011		P013	AHR	May-23
Heights Plan	SVEZ-AHR-MP-ZZ-DR-A-92-012		P014	AHR	May-23
Land Use Plan	SVEZ-AHR-MP-ZZ-DR-A-92-013		P014	AHR	May-23
Strategic Landscape Plan	SVEZ-AHR-MP-ZZ-DR-A-92-014		P08	AHR	May-23
Illustrative Masterplan	SVEZ-AHR-MP-ZZ-DR-A-92-015		P033	AHR	May-23
Road Layout Plan	SVEZ-AHR-MP-ZZ-DR-A-92-016		P05	AHR	May-23
SuDS Drainage Strategy Plan	SVEZ-AHR-MP-ZZ-DR-A-92-017		P03	AHR	May-23
Proposed Phasing Plan	SVEZ-AHR-MP-ZZ-DR-A-92-018		P07	AHR	May-23
South West Fence Plot Layout	SVEZ-AHR-MP-ZZ-DR-A-92-019		P02	AHR	Aug-23
Transport Assessment Addendum Part 1 of 2	10042920-ARC-XX-XX-RP-TP-0003-P3		P3	Arcadis	May-23
Transport Assessment Addendum Part 2 of 2	10042920-ARC-XX-XX-RP-TP-0003-P3		P3	Arcadis	May-23
General Arrangement Drawing 1 of 6	10042920-ARC-HGN-ZZ-DR-HE-0002		P02	Arcadis	Apr-23
General Arrangement Drawing 2 of 6	10042920-ARC-HGN-ZZ-DR-HE-0003		P02	Arcadis	Apr-23
General Arrangement Drawing 3 of 6	10042920-ARC-HGN-ZZ-DR-HE-0004		P03	Arcadis	Apr-23
General Arrangement Drawing 4 of 6	10042920-ARC-HGN-ZZ-DR-HE-0005		P03	Arcadis	Apr-23

General Arrangement Drawing 5 of 6	10042920-ARC-HGN-ZZ-DR-HE-0006		P02.1	Arcadis	Apr-23
General Arrangement Drawing 6 of 6	10042920-ARC-HGN-ZZ-DR-HE-0007		P02	Arcadis	Apr-23
Vehicle Swept Paths Sheet 1 of 6	10042920-ARC-HGN-ZZ-DR-HE-0015		P02	Arcadis	Apr-23
Vehicle Swept Paths Sheet 2 of 6	10042920-ARC-HGN-ZZ-DR-HE-0016		P02	Arcadis	Apr-23
Vehicle Swept Paths Sheet 3 of 6	10042920-ARC-HGN-ZZ-DR-HE-0017		P03	Arcadis	Apr-23
Vehicle Swept Paths Sheet 4 of 6	10042920-ARC-HGN-ZZ-DR-HE-0018		P03	Arcadis	Apr-23
Vehicle Swept Paths Sheet 5 of 6	10042920-ARC-HGN-ZZ-DR-HE-0019		P02.1	Arcadis	Apr-23
Vehicle Swept Paths Sheet 6 of 6	10042920-ARC-HGN-ZZ-DR-HE-0020		P02	Arcadis	Apr-23
Road Safety Audit 1	TSW-RW-23-4049-RSA1		N/A	The Safety Forum	Apr-23
RSA1 Response Report	10042920-AUK-XX-XX-RP-HS-0001-01		1	Arcadis	Apr-23
Updated Baseline Ecology Report	10042920-AUK-XX-XX-RP-DE-0002-05		5	Arcadis	Apr-23
Updated Habitat Management Plan	10042920-AUK-XX-XX-RP-DE-0019-06		6	Arcadis	Apr-23
Updated Statement to Inform Appropriate Assessment	10042920-AUK-XX-XX-RP-EC-0031-02		2	Arcadis	Apr-23
Updated Biodiversity Net Gain Report	10042920-AUK-XX-XX-RP-EC-20-07		7	Arcadis	Apr-23
Biodiversity Net Gain Delivery - Technical Note	N/A		N/A	Arcadis	Sept-23
Updated Biodiversity Net Gain Calculator	10042921-AUK-XX-XX-CA-EC-0030-04		4	Arcadis	Apr-23
Updated Tree Survey Report and Arboricultural Impact Assessment	10042920-AUK-XX-XX-RP-DE-0027-03		3	Arcadis	Apr-23
Heritage Desk based Assessment	10042920-ARC-XX-XX-RP-TC-0001-01		1	Arcadis	May-23
Updated Landscape and Visual Appraisal	N/A		6	Arcadis	Sept-23
Updated Drainage Strategy	10042920-SVEZ-ARC-XX-XX-RP-CE-0001		04	Arcadis	May-23

Statement of Reasons & Conditions

The submitted Statement of Reasons (SoR) has been updated to provide a summary of the statutory consultation. In addition, the LDO conditions outlined in the SoR have been updated to reflect the latest documentation and drawing revision numbers as well as to take on board comments and feedback from statutory consultees.

Design Code and Design and Access Statement

The submitted Design Code and Design and Access Statement have been updated to reflect the design amendments to the LDO, namely in respect of the illustrative masterplan, proposed landscaping design and phasing matters.

Concluding Remarks

We would like to thank Officers for their constructive feedback, dialogue and engagement in shaping the scheme to date. As set out in this covering letter and accompanying supporting information, the applicant and their project team have taken on board comments raised by Officers and statutory consultees and have made a number of significant amendments to the submitted scheme to address those comments.

The LDO will deliver a long-term legacy of new and enhanced job opportunities, helping to reprofile the economy to create opportunities for good quality employment in B&NES, and across the region. In addition the submitted scheme will deliver other social and environmental benefits through a high-quality proposal which has responded to the site's existing constraints and opportunities as well as feedback from Officers and consultees during the life of the project.

The SVEZ LDO will create a successful modern business park that attracts a range of employment to ensure a mix of jobs and skills sets and deliver a scheme that successfully contributes and compliments the wider Enterprise Zones in Bristol and Bath. The flexible nature of the LDO will future proof the commercial offer, providing space that allows businesses to effectively grow without the need to locate elsewhere as they expand. The delivery a range of complimentary amenity spaces will enhance workers experience and can support the existing community.

It is considered that the proposed SVEZ LDO strongly grasps sustainability, high quality design, viability, deliverability and complements, rather than threatens, neighbouring town centres.

We would now welcome and invite B&NES to support and adopt this LDO submission to allow the overall benefits of this development to be realised.

Yours Sincerely,

A handwritten signature in black ink that reads 'Alex Cave' in a cursive script.

Alex Cave
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