

Camerton PC_Comments on Local Plan HD-SCCW HE2 Option 1 and 2 (v6)

To:
Richard Daone
BANES Local Plan, Development
Management
Bath & North East Somerset Council

From:
Camerton Parish Clerk
On behalf of Camerton Parish Council
Camertonparishclerk@hotmail.co.uk

Date: 14 November 2025

Subject: Camerton Parish Council – Revised Comments on Local Plan HE1 & HE2 Options 1 and 2

Dear Mr Daone,

Camerton Parish Council submits the following consolidated and updated response to the B&NES Local Plan Options Consultation, focusing on the Somersetshire Coal Canal and Wansdyke (SCCW) policy area and specifically HE2 Options 1 and 2.

Three of the four proposed diversion routes in HE2 Option 2 fall within Camerton Parish. These proposals have generated extensive concern locally. Earlier correspondence from the Parish Council (June/July 2025) received no reply, initially no engagement meeting was offered, however a meeting is now in place for the 27 Nov. 2025. This lack of engagement has significantly reduced residence and Councils confidence in the Local Plan consultation process.

INTRODUCTION

The existing Placemaking Plan (2017) Policy HE2 protects the historic route of the Somersetshire Coal Canal and the Wansdyke through a defined buffer zone. This policy restricts development across the original route, including locations where houses were historically built before HE2 was introduced (e.g., Dunkerton, Durcott Lane, Monkton Combe).

The 2025 Local Plan consultation proposes two policy options:

HE2 Option 1 – Retain Existing Policy HE2 providing heritage protection of the historic canal route.

HE2 Option 2 – Create a new policy enabling a navigable canal by diverting the historic route where blocked by modern development, adding four new diversion corridors (three in Camerton, and one in Combe Hay).

This response sets out the Parish Council's concerns with Option 2 and issues requiring clarification in Option 1.

SUMMARY OF KEY CONCERNS

Six areas of significant concern remain unaddressed:

1. Effects on natural habitats and the Camerton Batch Local Nature Reserve
2. Long-term planning blight for affected residents
3. Lack of feasibility evidence
4. Unclear primary purpose of the policy
5. Loss or weakening of existing heritage protections
6. Lack of assessment of alternative policy approaches

1. IMPACT ON NATURAL HABITATS AND THE LOCAL NATURE RESERVE

1.1 Camerton Batch Local Nature Reserve (CBLNR)

The proposed diversion would cut through the designated Camerton Batch Local Nature Reserve (1997), a sensitive site supporting priority habitats and protected species.

The Local Plan contains no recognition of the nature reserve, no impact assessment, and no explanation of how excavation, spoil removal, soil stabilisation, re-planting, drainage or long-term management would be handled.

No justification is provided under the NPPF for including a nature reserve such as CBLNR within an expanded HE2 designation.

The Local Plan does not state which designation—local nature reserve or canal diversion—would have planning primacy.

No ecological assessment or statutory baseline evidence has been undertaken before proposing this route. This is a major procedural omission.

1.2 Impacts on wider habitats in the Cam and Wellow Valleys

The land along the disused canal has undergone more than 127 years of ecological succession and now supports extensive woodland, grassland and wildlife corridors that would be damaged or lost.

Creating a navigable canal would introduce noise, parking pressure, visitor traffic and disturbance into tranquil countryside in the Green Belt.

The Local Plan includes no strategy for visitor management, parking, access, or mitigation of construction impacts.

Large-scale construction over many years—excavation, spoil removal, heavy vehicle movements—would cause irreversible ecological harm.

2. PLANNING BLIGHT - NOT ADDRESSED

Many residents had never been informed that their properties were within the existing 2017 HE2 zone. Affected landowners were also not notified about the new diversion proposals before publication.

The proposal imposes restrictions to protect a speculative, long-term project with no feasibility evidence or funding.

The Local Plan offers no compensation, indemnity, or insurance mechanisms for affected landowners.

There is no clarity on compulsory purchase, liability for works, or long-term canal maintenance responsibilities.

Without such safeguards, HE2 Option 2 creates serious and indefinite planning blight.

3. LACK OF FEASIBILITY EVIDENCE

No feasibility study has been produced to demonstrate that a restored navigable canal is achievable.

A sufficient feasibility review would need to include at minimum:

- land acquisition requirements
- compensation implications
- capital and maintenance costs
- engineering assessments, including mine-shaft risks
- demand, visitor numbers and funding models

No hydrological assessment has been undertaken. Historically the canal failed due to insufficient water. No flood-risk assessment or groundwater modelling has been provided. No assessment has been made of local highway impacts, increased visitor traffic, or emergency access requirements.

None of this critical evidence has been published, yet the Local Plan proposes long-term land designations based on these untested assumptions.

4. UNCLEAR PRIMARY PURPOSE OF HE2 OPTION 2

Section 16 of the NPPF does not give sufficient grounds for designating or restoring a historic route by recreating it on diverted land.

The Local Plan must clarify whether the policy aims to:

- conserve the historic asset, or
- create a new recreational infrastructure project themed around heritage.

If a new part-historic/part-diverted/part-engineered canal is proposed, the Council must define what planning status such a hybrid asset would hold.

5. LOSS OF EXISTING HERITAGE ASSETS

Some residents presently protected under the 2017 HE2 buffer would lose heritage protection if the route is diverted elsewhere.

It is not clear what happens to previously protected heritage land that is not needed due to the diversion route being used. There is no justification provided for removing protections from genuine historic assets while allocating new weight to non-historic land.

Treating diverted land as “heritage net gain” is not supported by any policy basis in the NPPF or Historic England guidance.

The Plan does not clarify whether land removed from HE2 protection would become vulnerable to development. This lack of clarity may also inhibit future in-fill land development of the previously protected land. Without explicit policy wording, the removal of existing protections could lead to unintended consequences and speculative development.

6. UNASSESSED ALTERNATIVES

Reasonable alternatives that would address many concerns have not been explored:

- Retain HE2 solely as a heritage protection policy (Option 1) and address any future diversions through a separate, evidence-led process.
- Keep an expanded HE2 but require gateway evidence (feasibility, ecology, engineering, funding etc) before any diversion designation is activated.
- Treat the diverted canal route as a recreational project rather than expanding heritage designations, re-balancing the development planning ‘test’ on each diversion site.
- Commission or require independent studies before redrawing heritage buffers.

These alternatives would reduce planning blight, protect existing residents, and meet statutory requirements for evidence-based policy making.

CONCLUSION AND POSITION OF CAMERTON PARISH COUNCIL

Given the serious omissions and risks outlined above, the Parish Council’s position is:

1. Support for HE2 Option 1, subject to clarification of issues raised.
2. Objection to HE2 Option 2, as the proposed diversions are not justified, not evidenced, and impose unacceptable impacts on residents, habitats and heritage protections.

Yours sincerely,

Camerton Parish Clerk

On behalf of Camerton Parish Council