

Bath and North East Somerset Council Draft Core Strategy Representations by Plan Reference: Whole Document Representations

Plan Reference: Whole Document

Reference: 1\1 S

Respondent: BCUS Homes

Representation Supportive of the whole document.

(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 7\1 S

Respondent: Office of the Traffic Commissioner

Representation I have nothing to add to the consultation at this stage.

(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 8\1 S

Respondent: Trevor and Sheila Davis

Representation Thank you for sending us the forms for the Draft Core Strategy. As we have now been told that the land

(soundness): behind our back garden is staying as Green Belt, and not now being built on, by a company called Pegasus. We are delighted. Thank you very much.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 11\1 S

Respondent: Civil Aviation Authority

Representation Thank you for your recent correspondence relating to the draft Core Strategy.

(soundness):

Whilst the CAA would not wish to comment on such plans, where officially safeguarded aerodromes lie within the Council's area of jurisdiction, we recommend that the Council considers the need of such aerodrome(s) within your development plan and consult with the aerodrome operator(s)/licensee(s) directly.

Notwithstanding the comments above, the following, whilst by no means a comprehensive list of all development/aviation related issues, might provide useful background material:

- 'Other' Civil Aerodromes. Operators/licence holders of civil aerodromes other than those that are officially safeguarded are advised to take steps to protect their locations from the effects of possible adverse development. To this end local authorities might agree to accept a 'non-official' safeguarding map from any local aeronautical site. If the Council has agreed to hold such maps, it should approach the site operator directly for comment on planning matters. Local planning authorities are asked to respond sympathetically to requests for non-official safeguarding. The CAA is prepared to offer advice

on the preparation of a nonofficial safeguarding map at the request of any aerodrome operator or local planning authority. ODPM Circular 1/2003 (Annex 2, paragraph 13) refers.

- Telecom Installations. Whilst it is noted that the General Development Order states that applications for masts within 3 km of an aerodrome should contain evidence of notification to the CAA or aerodrome operator, the appropriate contact is the aerodrome operator. Notification to the CAA will result in advice to contact the aerodrome operator.
- Wind Turbines. All wind turbine proposals, whether prior to, or at, formal planning application stage, should be notified to both the CAA's Directorate of Airspace Policy and to the Ministry of Defence (Defence Estates). Addresses for each organisation are:
 - Directorate of Airspace Policy, K6 Gate 3, CM House, 45-59 Kingsway, London WC2B 6TE;
 - Safeguarding, Defence Estates, Blakemore Drive, Sutton Coldfield, B757RL
- High Structures. Notwithstanding the requirements of local aerodrome operators to consider the impact of structures within their (officially or unofficially) safeguarded area, away from the immediate vicinity of an aerodrome, tall structures might nevertheless constitute an aviation hazard. In view of this, there is a mandatory lighting requirement for structures of a height of 150m or more. Moreover, away from aerodromes, even structures less than 150m high may need to be lit if by virtue of their nature or location they constitute a significant hazard to air navigation. It is recommended that all proposed developments over 90m in height should be notified to the Directorate of Airspace Policy (DAP) and comment sought relating to the need or otherwise for aviation obstruction lights. Additionally, to cater for the need to record in aviation documents and charts structures extending 91.4m (300ft) above ground level, local planning authorities are asked to inform the CAAIDAP about developments that might breach this level. DfT 1ODPM Circular 1/2003 (Annex 2, paragraph 30-32) refers.
- Venting and Flaring. Venting and flaring of gas should be anticipated with mineral extraction. This might have a potential impact upon the safe operation of aircraft in the immediate vicinity. With this in mind, should planning permission be granted, it would be essential to establish whether such releases of gas would constitute a potential danger to overflying aircraft. If there were such a danger, the site would need to be promulgated to the aviation community along with advisory avoidance criteria.

We hope this is of use. Should the Council wish to discuss any related issue or seek clarification of any point, please do not hesitate to get in touch.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 62\1 S

Respondent: Mr Joe Segura

Representation (soundness): Supportive of the whole document.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 67\1 S

Respondent: Mr Trevor John

Representation (soundness): Supportive of the whole document.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 68\1 S

Respondent: Mrs Jennifer John

Representation (soundness): Supportive of the whole document.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 81\1 S

Respondent: Camerton Parish Council

Representation (soundness): Supportive of the whole document.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 113\1 S

Respondent: Miss Linda Clark

Representation (soundness): I support the new draft strategy because it has taken on board the concerns the public have raised in the previous strategy and decided not to build on green belt land and meet housing needs on brownfield and unused empty buildings in Bath (as I raised in my previous objection). I approve the acraping of unrealistic housing targets

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 130\2 S

Respondent: South Stoke Parish Council

Representation (soundness): Congratulations on an impressive document. The Parish Council has asked me to confirm its support, which I am happy to do. Other than for this technicality the draft has our full support. Once again our congratulations for the production of a brave and inspiring document. You will appreciate that we must reserve the right to appear at the hearings in the eventuality of challenge there by others.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 143\6

Respondent: Bathampton Parish Council

Representation (soundness): We welcome the requirement to provide 17.7% of AH on for small sites of 5 to 9 dwellings or 0.25 to 0.49 ha. However, such a requirement may well work against the intention of the policy by stimulating applications for permission to build 4 dwellings. For that reason, we consider the CS should explicitly encourage the LPA to routinely seek some provision of AH on development sites of less than 5 dwellings in the rural settlements

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 148\5 S

Respondent: Bath Chamber of Commerce

Representation (soundness): I am writing on behalf of Bath Chamber of Commerce to express our broad support for the latest Core Strategy Document. We have been appreciative of being fully informed of developments and grateful that many of our original observations on the original have been incorporated into the new version.

However, there are six points that I need to raise on behalf of our members, who form a significant part of the business community.

5. We would like to note our impression that there have been occasions in the past when some Council Departments have seemed to be at odds with others. We very much hope that the Core Strategy is shared by the entire local authority.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 148\6 S

Respondent: Bath Chamber of Commerce

Representation (soundness): I am writing on behalf of Bath Chamber of Commerce to express our broad support for the latest Core Strategy Document. We have been appreciative of being fully informed of developments and grateful that many of our original observations on the original have been incorporated into the new version.

However, there are six points that I need to raise on behalf of our members, who form a significant part of the business community.

6. Finally, we would like to see even greater efforts put into encouraging more inward investment. The business community is more than willing to play its part. We could circulate material to contacts and even act as ambassadors when the opportunity arose if there was suitable literature available to distribute. I would be happy to discuss this with appropriate officers.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 180\13

Respondent: J S Bloor Ltd

Representation (soundness): The Core Strategy envisages the deliverability of 11,000 dwellings in the plan period, section 2g refers to Infrastructure and Delivery. Of the 11,000 dwellings, the strategy envisages 6,000 at Bath i.e. 54.5% (3,500 in the Central Area and Western Waterfront and 2,500 in outer neighbourhoods and surplus MOD land.) This strategy relies on land that "has been earmarked for a major programme of residential led regeneration for a number of years." (page 44 of the Consultation document). The Western Riverside was allocated in the adopted BANES Local Plan of October 2007 and although supported by a Master Plan Supplementary Planning Document of March 2008 it has failed to come forward as anticipated. Its deliverability must be questioned and therefore its contribution to meeting the housing needs of BANES given paragraphs 2.40 and 2.41.

The delivery of the Bath spatial strategy as acknowledged in the Core Strategy will need to be supported by the provision of necessary infrastructure. Paragraph 2.40 states that in order to realise the development potential of the Central Area and Western Corridor, parallel enabling investment will be needed. Given the investment required in transportation and flooding the deliverability must be questioned.

Paragraph 2.41 refers to the Council securing programme entry for £54m major scheme of Transport Proposals for Bath and is currently moving towards full Government approval. Several questions arise in terms of how the timescale for funding the transport proposals will affect the deliverability of much needed housing. Concerns are expressed about the availability of funding given the Comprehensive Spending Review. If funding is not forthcoming this will delay the deliverability of the scheme.

Change sought to make sound: There is a need to allocate more housing not only to meet housing forecasts consistent with the latest 2008 based household projections but also to provide sufficient flexibility in housing delivery should the funding for the Central Area and Western Corridor not come forward in the timescale. Land at South West Keynsham is consistent with the urban extension identified in the Regional Strategy and can come forward to meet identified housing needs. Representations were made to the Consultation on the Spatial Options in 2009 to support the location and its contribution to meeting the housing needs of BANES (see representations in particular on Policy DW01 and Policy KE1).

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 198\1 S

Respondent: Mr and Mrs. Harrison

Representation (soundness): Supportive of the whole document.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 231\1

Respondent: Mr Langton

Representation (soundness): The manner in which the Council gave itself permission to continue with the BRT after having voted not to proceed is certainly open for further investigation as are all the statistics and information they have gathered to back up their contention that the city needs the BRT.

It is obvious from reading the Core Strategy that it has been cobbled together in order to comply with the government's funding criteria regardless of the consequences. As result we have a severely flawed document that is no longer coherent, purposeful, well targeted or affordable. The Council itself has had yet again to alter its scheme regarding the BRT by having to raise a further £8.7 million to keep the misguided idea afloat. As a result items that were generally supported and needed were discarded without due consultation with all parties. It is patently clear from this action that the Council's strategy is by no means as flexible as the government requires.

The basis of the core strategy is figures and economic forecasts, many of which were collected twenty years ago when things were very different. The Council has signally failed in its duty of care to the government as well as the local residents by not collecting new and accurate information and demonstrating honesty and integrity in doing so and ensuring that all information was available during the much shortened consultation time.

So far the Council appears to have failed in using either integrity or honesty over the production of the Core Strategy. There are serious omissions in the document such as the Flood Risk Management report which we were informed would be in the document so that it could be considered in detail. Again

where are the infrastructure studies that were to accompany the document – very significant that they are missing as well.

The Council it would appear are also in serious error by not following the government guidelines when issuing the CPOs required for the BRT scheme. In fact there are grounds for a judicial review of this matter.

The Council also has to provide irrefutable evidence that there is a definite need for such schemes as the BRT in light of the present economic downturn. It is not enough to draw conclusions from the air such as the expected growth of Bath in the next decade or so – 17% when in the last fifty years it has barely grown 3%.

Until such time the Council can provide substantive and factual evidence for all their prognoses referred to in the DCS the entire document should be regarded with the greatest of caution. Perhaps the old adage of “less haste more speed” would have usefully been applied here, as the DCS in its present form is nothing more than a mess of expensive potage!

Change sought to make sound: Instead of blindly following government funding criteria at whatever the cost, return to the drawing board and rethink the entire strategy. Already too much money has been wasted but this is small in comparison to that which will be lost should the Council continue on its present course.

Purposeful consultation with the residents would be a good basis from which to start. All paperwork and drawings to be easily comprehended by the average person, no more patronising attitudes from Council staff and consultants employed by them (some at an extortionate rate of £1,200 per day!).

An open apology from the Council to say SORRY we got it wrong would go along way to restore confidence in the Council’s integrity and honesty. This in turn would have the beneficial effect of diminishing the current overriding atmosphere of distrust and antagonism between the Council and the residents. Once this basis is restored then all concerned can move forward in a positive and constructive manner.

Representation (legal compliance): Because the Council has not complied fully with the governments basic instruction requiring the Council to enter into informative and instructive consultation with all interested parties as well as local residents. The Council effectively disenfranchised a large percentage of the population by placing all information on an inaccessible web site which is certainly not fit for purpose. The language used within the document is far too inaccessible for the average person, and the ineffective and misleading answers given by those manning the “public” consultation days were a disgrace. Many of those employed on those days were ignorant of the issues involved and were obviously not encouraged to be helpful or knowledgeable.

The Council has cynically used a government initiative to obfuscate those whom they should be acting for. It is plain that the Council has done the absolute minimum to in their opinion to comply with all legal criteria appertaining to the construction and development of their DCS document.

By taking this attitude I believe the Council has not been as compliant as it should have been, since a considerable amount of the information that should have been forthcoming has not been and the method chosen to disseminate what information there is to the residents was unhelpful, ineffective and confusing. This is especially so when considering the claims of sustainability mentioned within it as the SCS and SCHLAA reports were conspicuous by their absence!

Change sought to make legally compliant: The production of the missing reports and significantly greater opportunity for constructive consultation not just a “glancing blow towards” this basis requirement.

Greater consideration should be given to the language and construction of the DCS as in its present form it is by no means accessible or meaningful to the audience it is aimed at.

Reference: 246\10 S

Respondent: Combe Hay Parish Council

Representation (soundness): Particular elements of the Core Strategy Publication Version which are strongly supported by Combe Hay Parish Council.

35.Access.

Page 129 paragraphs 6.93, 6.95, 6.96 and 6.98

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 248\7

Respondent: Crest Strategic Projects and Key Properties Ltd

Representation Paragraph 1.36: Contingency

(soundness): 52)None of the requirements of PPS3 paragraph 62 have been adhered to. Paragraph 1.36 and the accompanying text in Policy SW01 is 'throwaway' to the extent it has no meaning. To suggest that there is flexibility in the sites identified that can respond in a strategic sense is naïve to say the least. To suggest that Western Riverside can be reviewed to provide a redistribution in scale of development belies the fact that the proposals for this development have been years in the making and viability is a critical issue that fundamentally affects the quantum and form of development. To suggest the proposals could be changed on a whim shows no appreciation of how development works. The same applies for the other developments listed.
53)There is no contingency in this Core Strategy. It should be found unsound on that basis alone.

Change sought to make sound: 1)Policy DW1 goes to the heart of this CS. RPS considers it to be so fundamentally unsound that the only course of action is to abandon the plan and start again with a clear direction to deliver ambitious growth that meets the needs of BANES and contributes to wider sub-regional goals.
2)Essentially, this means planning for a higher rate of growth; that is 21,300 homes as set out in the RSS Modifications but seeks to make provision for that in a flexible and transparent way. It also means creating the context for ambitious economic growth in line with the West of England LEP objectives. The LEP predicts GCA growth in the West of England of 3.4% (by 2020); this Core Strategy prefers to plan for 1.6%. Not only does this show a marked lack of ambition at odds with its own vision and objectives, but the examination of this CS must focus on the wider impact at a sub-regional level and the associated negative social and economic consequences.
3)To do this requires the CS to recognise the need for sustainable urban extensions to the cities of Bristol and Bath. As it stands there is a major policy omission. RPS is promoting the land at Hicks Gate as a sustainable urban extension to Bristol. To that end, RPS submits a separate 'Policy Omission' Paper (below) that considers the role of Hicks Gate and evidence base that underpins it. The 'evidence base' in the form of a Statement of Delivery was submitted at the time of the Spatial Options consultation in December 2009; RPS has confirmed with Council Officers that this evidence can be taken forward to examination without the need to resubmit.
4)The paper below also seeks to appraise the Sustainability Appraisal, comparing the SA at the Spatial Options stage and its latest publication version.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 252\1 S

Respondent: Cadbury Kraft Foods

Representation Dear Sir/Madam

(soundness):

REPRESENTATION TO BANES DRAFT CORE STRATEGY (DECEMBER 2010) CADBURY SOMERDALE

We write on behalf of our client, Cadbury/Kraft Foods, to submit representations to the above Core Strategy in respect of their site at Somerdale in Keynsham and set out our comments below.

Background

Cadbury Somerdale is located in Keynsham, which is strategically located between Bristol to the west and Bath to the east. The site comprises the Somerdale factory buildings and associated land (including The Hams), which extends to 220 acres (90 hectares), with 63.33 acres (25.64 hectares) of developable

land. The factory recently ceased manufacturing and closed in January 2011.

Cadbury Somerdale is located in north Keynsham, in close proximity to the Town Centre and Keynsham Train Station. It is an important site, which has considerable potential to contribute to and complement the future development of Keynsham. This is recognised by BANES who support the future development of the site for a mix of uses including residential. In recognition of the site's potential, Cadbury's project team has been working with BANES to prepare a Vision for Somerdale to show how a comprehensive mixed-use development could be achieved on the site. This document comprises a range of development principles for the site that aim to create a unique place with a strong identity and a development which will integrate with and contribute to the regeneration of Keynsham Town Centre. The Vision also identifies the potential for Somerdale to accommodate approximately 600 residential units and 20,000 sq m of employment floor space (to create up to 900 jobs) with sports and recreation facilities.

The preparation of the Vision has involved extensive meetings with various stakeholders. The Vision was presented to and discussed with officers at Internal and External Gateway Group 2 meetings and with members of Keynsham Development Advisory Group (KDAG). A Public Exhibition was also held in Keynsham in February 2009, where the Vision was shared with the local community and where positive feedback was generally received. Following this work, the Vision was also considered at BANES' Development Control Committee on 15 April 2009, where the Committee noted its content.

The Vision is supported by a range of background documents and technical work. This includes reports on transportation, ecology, flood risk, ground conditions and service and infrastructure amongst others. These reports support the development principles within the Vision and do not identify constraints which would otherwise prevent development of this scale and nature coming forward. Further information in respect of the above exercise and/or the technical survey work accompanying it, can be provided upon request.

Cadbury/Kraft Foods is proposing to bring the site to the market this year to find a development partner who will be responsible for preparing detailed design proposals for the future development of the site.

BANES Adopted Local Plan

The site is currently allocated under site specific Policy K1 in the adopted Bath and North East Somerset Local Plan (2007), which identifies that Somerdale should provide 10ha of land for business development (Use Classes B1, B2 and/or B8), 50 dwellings, replacement recreational and social facilities and related infrastructure and landscaping works. It should be noted that Policy K1 relates to the development of the site with the retention of the factory as the policy was approved prior to Cadbury's decision to close the factory in early 2008.

The current adopted policy therefore does not reflect the full development potential of the site. This is recognised by BANES, who consider the site to be a strategic development site which is capable of accommodating significant levels of development. This is reflected in the previously published Core Strategy (December 2009) which identified Somerdale as part of a Strategic Site which could accommodate up to 650 homes and a proportion of the 2,100 jobs identified for the whole of Keynsham.

The Regional Spatial Strategy (RSS)

The draft RSS, identifies that the District should aim to deliver approximately 15,500 homes and approximately 17,000 jobs over the plan period. This is significantly lower than the draft housing figures proposed by the Panel's recommendations following the Examination in Public (EiP) which advocated the inclusion of an urban extension to the south west of Keynsham comprising up to 3000 new homes and the Government's changes which proposed a greater level of growth for the District, as set out in the table below.

RSS Stage Overall Net Dwelling

Requirement in BANES Overall Annual Average Net Dwelling Requirement
Draft RSS 15,500 775
EiP Panel Report Recommendations 18,800 940
Government Proposed Changes (July 2008) 21,300 1,065

The increase in growth proposed by EIP Panel Report and the Government is due to the fact that Keynsham has been recognised as the preferred location for more significant levels of housing development. It benefits from a strategically important location with excellent road and rail links to Bristol and Bath and as a town in its own right, has been identified as requiring additional housing and employment development to generate prosperity and to contribute to a revitalised identity for the town.

Proposals to abolish the Regional Spatial Strategy (RSS) has provided B&NES with the opportunity to move away from regionally imposed growth targets and establish its own requirements in response to local circumstances. This process has involved analysis of new, up-to-date evidence, formulation of options to meet the objectives, engaging with local communities, testing these through the sustainability appraisal and assessing deliverability. Account has also been taken of the District's functional relationship with neighbouring authorities. Whilst the proposed housing and employment figures for the District have been heavily reduced by B&NES, from 15,500 to 11,000 units and 17,000 to 8,700 jobs respectively, this has not affected the proposed targets for Keynsham.

Spatial Vision and Objectives

The spatial vision and strategic objective set out in section 1C of the draft Core Strategy identifies that: 'Keynsham is a historic town that occupies a strategically important location between Bristol and Bath and is therefore well placed to improve and attract investment. It will continue to act as a market town and service centre for the surrounding area. In responding to the loss of a major employer, it will evolve as a more significant business location. Keynsham will retain its independence and its separate identity within an attractive rural setting. It will become a more sustainable, desirable and well connected place in which to live and work, with an enhanced town centre inspired by its heritage and cherished rivers, park and green spaces'.

Objective 2: 'Protect and enhance the District's natural, built and cultural assets and provide green infrastructure' seeks to ensure amongst other things to optimise the use of brownfield opportunities in meeting housing and economic development needs and avoiding greenfield land as far as possible. We welcome BANES' proposed spatial vision and strategic objectives over the Plan Period and support the focus of growth in sustainable locations, such as Keynsham.

Keynsham Spatial Strategy

The Core Strategy makes provision for around 11,000 new homes and around 8,700 new jobs within the District. The strategy is to locate new development in the most sustainable locations and to steer growth to brownfield land in urban areas of Bath, Keynsham and the larger settlements in the Somer Valley. In respect of Keynsham, Policy KE1 'Keynsham Spatial Strategy' in the draft Core Strategy proposes to allocate 1,500 new homes and 1,500 new jobs within this area. Around 800 homes are already committed. The remaining 700 dwellings are directed towards the town centre and Somerdale. Somerdale is also seen to be key to the realisation of the strategy for Keynsham and its redevelopment should provide a new high quality, exemplar, mixed-use quarter providing significant employment floorspace and new homes.

Town Centre /Somerdale Strategic Policy

In the draft Core Strategy, Somerdale and Keynsham Town Centre is allocated under Policy KE2 'Town Centre /Somerdale Spatial Policy', which states that this area should make provision for the following scope and scale of change: - Up to 700 dwellings.

- A new high quality, exemplar, mixed-use quarter at Somerdale, providing significant employment floorspace, new homes, leisure and recreational uses.
- New office development at the Centre/Town Hall site including a new library, retail units at street level, leisure facilities and residential dwellings.

- Some larger retail units to provide space for high quality, national retailers which complement the existing successful independent retailers.
- Diversification of the employment base in order to offer greater opportunities for the resident population.
- A District Heating Network, with potential identified at Somerdale and the town centre. In addition, the Policy includes a number of place making principles for the site, including
 - Reinforce and enhance the historic character and qualities of the Conservation Area ensuring local character is strengthened by change. The linear pattern and fine grain of the High Street should be maintained and enhanced.
 - Improve the quality of the public realm including provision of a new civic space.
 - Improve the connections between Ashton Way car park, the High Street and the Memorial Park.
 - Retain the avenue of trees in Somerdale Road and consider the potential for converting and reusing some or all of the factory buildings at Somerdale.
 - Improve the links between the town centre and Somerdale, ensuring that the new mixed use quarter is integrated with the rest of Keynsham.
 - Enhance the town centre to make it a more vibrant and attractive area, enabling all members of the community to enjoy it over a longer period of the day.
 - Retain and enhance the leisure and recreation function of the town centre and Somerdale.
 - Enhance the rivers, park and green spaces and link them together to form an improved green infrastructure network (linking the town internally and to its environs).
 - Protect the character and recreational value of the Memorial Park and the Hams.
 - Provide new employment opportunities that help establish Keynsham as a more significant business location, diversifying the economy, and providing jobs, especially in the Higher Value Added sectors.
 - Improve the management of traffic through the town centre and enhance public transport provision.
 - Create / enhance links from Keynsham to the surrounding national and regional cycle networks.
 - Improve air quality in the town centre as part of the Air Quality Management Area.

We fully support and endorse the identification of Somerdale as part of a strategic development site within Policy KE1 and KE2. This emerging policy reflects the significant potential of Somerdale as a major development site within the District, which will provide new employment and houses as part of a new, distinctive high quality neighbourhood and will contribute to the future of Keynsham. However, we also make the following points:

1. The strategic site can potentially accommodate further development. The Somerdale Vision identifies that the site can accommodate approximately 600 dwellings and 20,000 sq m of commercial space. The capacity put forward for the strategic site of 700 units should therefore take account of the level of development which can be accommodated on Somerdale and any other sites which will be coming forward in the area over the Plan period.
2. We acknowledge the desire to provide a District Heating Network within Keynsham, with potential at Somerdale and the town centre. However, actual proposals for sustainable energy measures on the site will need to be fully explored as part of the future development proposals for the site.
3. With regard to consideration being given to the potential for converting and reusing some or all of the factory buildings at Somerdale, this approach is consistent with the development principles within the Vision. The Vision identifies that consideration will be given to the retention of buildings and assets where viable and capable of making a positive contribution.

Renewable Energy and Sustainable Construction

Policy CP1 'Retrofitting existing buildings', Policy CP2 'Sustainable Construction', CP3 'Renewable Energy' and CP4 'District Heating' all relate to sustainable design and construction and renewable energy. The proposed planning policy framework seeks to encourage reductions in the use of energy and the incorporation of renewable energy measures within schemes. We support the principle of reducing energy consumption and promoting the use of renewable and low carbon sources of energy within developments. In respect of Somerdale, opportunities will be explored through the Masterplanning exercise process to identify the most appropriate energy design measures for the site. We consider that each policy should provide more flexibility to take account of particular site constraints and considerations to ensure that development proposals are technically feasible and financially viable.

Infrastructure Provision

Policy CP13 'Infrastructure Provision' identifies that new developments must be supported by the timely delivery of the required infrastructure. Developer contributions will be based on the Planning Obligations SPD and its successors.

Table 6 in section 3D of the draft Core Strategy identifies the infrastructure required at Keynsham to support the development strategy. This includes:

- Flood protection measures at Somerdale;
- Major improvements to improve sewerage capacity;
- Secondary road access to the Somerdale site;
- Improvements to Keynsham Train Station and Enhanced Service Frequency; and
- Improvements to public transport and enhanced connectivity between cycling, public transport and walking routes.

Paragraph 3.2.1 also sets out the desirable infrastructure items of importance to the town.

We recognise the need for new development to ensure that infrastructure requirements generated by development are addressed. However, we consider that requirements should be considered on a site specific basis. Any planning obligations sought should be reasonable and should relate to the scale and kind of development proposed. The overall costs arising from Section 106 obligations should not affect the financial viability or delivery of a scheme, in accordance with the fundamental principles set out within the ODPM Circular 05/2005 on Planning Obligations Provision should also be made in this policy for infrastructure requirements and planning obligations to be prioritised by the Council to ensure preference is given to the most urgent needs where viability issues arise.

Affordable Housing

Policy CP9 states that affordable housing will be required as on-site provision in developments of 10 dwellings or 0.5 hectare (whichever is the lower) and above. An average affordable housing percentage of 35% will be sought on these large development sites. This is on a grant free basis with the presumption that on site provision is expected. Higher affordable housing proportions (up to a maximum of 45%) may be sought in individual cases, taking account of: a) whether the site benefits from above average market values for the district; or b) whether grant or other public investment may be available to help achieve additional affordable housing. In some cases the scheme viability may justify the Council accepting a grant free provision of affordable housing below the average of 35%. The proposed policy for the district's affordable housing is to achieve an average of 35% affordable housing on large development sites. Whilst we do not object to the principle of setting 35% affordable housing as a target, we object to the current wording of the policy. The policy in its current form is highly restrictive as it would only support lower levels of affordable housing on schemes which are unsupported by grant funding. However, other site constraints, improvements and infrastructure costs will affect development viability and may warrant lower levels of affordable housing being provided on sites. The policy should therefore be reworded to take account of this and to allow the actual level of affordable housing to be provided within a development to be considered on a site by site basis, subject to robust viability testing. The same approach should apply to the 45% threshold. Policy CP9 also identifies that the Council will seek an affordable housing tenure split of 75% social rented and 25% intermediate housing and that whilst the size and type of affordable units will be determined by the Council to reflect the identified housing need, there will be an aspiration to achieve at least 60% of affordable housing as family houses including some large 4/5 bed dwellings. Again, we object to this aspect of the policy as it is inflexible. The actual size and type of affordable housing to be provided should be determined on a site by site basis, to take account of local need and viability. This approach in turn will not threaten the viability of development and restrict the ability of sites to come forward in accordance with Circular 05/05.

Historic Environment

Policy CP6 refers to preserving and enhancing the District's historic and cultural environment. Cadbury Somerdale is not listed nor is it located within a Conservation Area and as such the above policy would not apply to the site. Recent consideration was also given by English Heritage and the Department of Culture and Media and Sport (DCMS) to the potential for listing the Somerdale factory buildings.

However, the buildings were not considered to be of significant or national interest and for these reasons a decision was taken not to list the buildings in July 2008. Whilst the above policy does not apply to the site, flexibility should be provided within any emerging policy with regard to the re-use of historic buildings and the incorporation of historic assets. PPS 5 acknowledges that the re-use of historic buildings should take into account the viability of converting historic buildings and the implications this has for achieving sustainable design targets.

Conclusion

We consider that the draft Core Strategy puts forward positive development principles for Somerdale and Keynsham. In summary, it is considered that:

- Somerdale is a significant development site and will positively contribute to the growth and future regeneration of Keynsham. We support the allocation of Somerdale as part of the Strategic Site but consider that the site may be able to accommodate in excess of 700 units. Somerdale should be identified as having the potential to accommodate approximately 600 residential units and 20,000 sq m of commercial space alone, in line with the Somerdale Vision. It may therefore be appropriate to increase the quantum of development for the Strategic Site as a whole (subject to the review of other sites coming forward);
- Somerdale is classified as previously developed. We fully endorse B&NES intentions to prioritise Somerdale for development ahead of undeveloped greenfield sites in accordance with government guidance contained in PPS3; and
- Policy CP9 relating to affordable housing is too restrictive and should be reworded to provide more flexibility to enable viable developments to come forward.

We reserve the right to vary or supplement these representations.

Please would you acknowledge receipt of these representations and advise us of the next stages of the Core Strategy and the other Development Plan Documents that comprise the Local Development Framework. Should you have any queries, please do not hesitate to contact John Bowles or Nicola Forster.

Yours faithfully
BNP Paribas Real Estate

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 257\8

Respondent: Valley Parishes Alliance

Representation We strongly advocate the recognition of the Avon Valley east of Bath as a distinctive key asset should
(soundness): be shown on Diagrams 4 and 5. For reasons elucidated in another representation we consider the diagrammatic representation of Park and Ride site at Bathampton meadows should be deleted. The Kennet and Avon Canal is dealt with separately in the representation on Policy CP7.

Change sought to make sound: Recognise the Avon corridor east and southeast of Bath as a key asset on Diagrams 4 and 5.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\17

Respondent: Bath Heritage Watchdog

Representation Objective 4 Bullet Point 8 "parks". This is far too narrow and should include gardens and visually
(soundness): important open spaces. This should include maintenance of views, including the felling or pruning of trees where they block important sight lines.

There are considerable doubts about the will to preserve, even improve, the value of these. There are no policies designed to define and control what happens to visually important open spaces, yet such spaces are an integral part of the Outstanding Universal Value of Bath. On a smaller scale, there was room for flower beds in Southgate Street and the Southgate shopping centre, but no requirement for them was included in the planning permission, leaving sterile hard surfaces in every direction. In St James Rampire, there was a raised bed garden which gave a splash of colour, and it was removed and replaced by stone paving.

Change sought to make sound: Extend the scope to Parks, gardens and visually important open spaces.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\125

Respondent: Bath Heritage Watchdog

Representation (soundness):

Change sought to make sound: Delete all reference to the Transport Package and the Infrastructure Delivery Programme in which it is embedded. Other changes as identified in part 6b

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 266\36 O

Respondent: The Bath Society

Representation (soundness): 2g Infrastructure & delivery (pp.56-57)

Whilst we welcome the City-specific detail about these matters contained in this little sub-section, we are concerned that what little is said about transportation in the document overall, is more or less limited to just three paragraphs, plus Table 5, here (page 57). We note that all the main elements of the £54million 'Bath Transport Package' are listed here, but remain unconvinced that all are needed in order to 'enable the programme of development set out in the spatial strategy...' (para 2.45) and, in particular, the segregated bus route in Newbridge. We also have serious concerns about the siting of the new eastern park and ride on Bathampton Meadows. The 'lonely' four lines of text on rail transport (para 2.46) indicate that opportunities for further fixed rail contributions to public transport in BANES in general, and Bath in particular, have been side-lined. We would fully support the Authority in pressing any case for further investment in rail infrastructure and services.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 267\1 S

Respondent: Bristol City Council

Representation (soundness): Thank you for the opportunity to comment on the Bath and North East Somerset Draft Core Strategy Publication version.

A report detailing the contents of the document was recently considered by the Executive Member for Strategic Housing and Regeneration, Councillor Anthony Negus and met with his approval.

The report concluded that the proposals in the Core Strategy to focus development in the urban areas of Bath, Keynsham and Somer Valley to support greater self-containment and limit the degree of commuting into Bristol support the principles of sustainability and are welcomed and supported by Bristol City Council.

In addition I would add that the spatial strategy for Bristol City Council included within the Core Strategy does not make provision for any urban extensions, and it prioritises the use of brownfield land for new development whilst retaining the Bristol-Bath Green Belt. This largely mirrors the approach taken in your Core Strategy.

The Bath and North East Council Core Strategy Publication Version is thus considered sound in all respects.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 273\1

Respondent: Transition Bath

Representation We find the lack of correlation to the previous document with a multiple of changes highly confusing,
(soundness): lacking a concise focus as if it has been designed to hinder rather than make clear the future aspirations for the benefit of the whole community.

There are lots of fine words particularly in relation to climate change, and peak oil is mentioned. However this sometimes seems to be putting the emphasis on adapting to climate change rather than the importance of mitigating climate change before it develops further.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 273\7

Respondent: Transition Bath

Representation We are disappointed to see that so much of the Core Strategy is based on growth. For example, in
(soundness): section 1e Table 3, Strategic objectives and SCS drivers, every point includes the word 'Growth' including 'Deliver well connected places accessible by sustainable means of transport'. The document does not address the key challenge of how growth may be balanced by reducing fossil fuel consumption and CO2 emissions.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 291\2

Respondent: Stubbs Rich LLP

Representation Drafting Comments

(soundness):

1. The use of the indefinite areas of colours on maps and imprecise routes (e.g. possible bridges) might appear helpful. (Diagrams 4 & 5). Unlabelled diagrams on p.43. However, as a former landowner whose land was blighted by an unsubstantiated line on a plan in the previous Local Plan First Draft, I object to this technique. All spatial inferences in the core strategy must be precise as to ownership and availability, so that landowners may raise reasonable objection during construction.

The graphical technique may render the current consultation unsound because owners whose land is implicated may not be altered to the risk because of the imprecision.

2. The graphical technique has also lost some legibility - for example - hyphens between ranges of numbers have been lost e.g. B2/46. Please ensure that the publication process has thorough and last-in-time proof reading.

3. Inconsistent use of "figure" or "diagram". E.g. B2/3 refers to "figure 7" which is labelled "diagram 7".

4. Paragraph numbering is inconsistent. Every paragraph must be logically and comprehensively numbered. Referencing my comments has been a nightmare.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 291\3

Respondent: Stubbs Rich LLP

Representation Supporting Documents
(soundness):

The efficacy of this Core Strategy is attendant in the publication for consultation of several key supporting documents as below. I encourage the Council to provide funding for these documents to avoid the risk that the core strategy process be found unsound.

-Placemaking Plan
-Building Heights Strategy

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 294\1

Respondent: Tom Burnford

Representation I have been contacted to participate in the Draft Core Strategy consultation. Having tried to navigate
(soundness): through a plethora documents in order to enable myself to submit these comments as I see fit, I find myself at a loss on how to do this. As such, this has become my first objection to the documentation. It has been poorly compiled, in a way that comes across as obscure. In future, the process of gathering consultation responses by B&NES must be streamlined. A single response document, with a simple relevant title, or a single, specifically targeted and labelled website address leading to a space where comments can be entered online is an absolute necessity. Currently, neither of these are provided on the homepage of the Draft Core Strategy Consultation page of the council's website. It is an elementary oversight.

To proceed I would like to point out the primary positive aspect of the document that I have discerned. The document sets out to define thoroughly the issues BANES faces at the current time which might act as a reasonable basis for analysis of future developmental directions for the area. In other words it is successful in setting out what issues the region needs to address.

Unfortunately this is the only thing about it I can single out for praise. The problem then is that the document goes on to set out highly specific design strategies and solutions to tackle those issues. This is the fundamental basis of my objection to the Strategy document.

This approach assumes a certain role for the local authority which I believe to be beyond its remit. It is essentially a "top down" approach to policymaking which succeeds in being both disempowering of the citizens of the region, and patrician in tone.

By setting out such specific design and development proposals, the space for direct participation of local citizens in steering the future of the region in which they live is shrunk, or even closed. As with the comment process available made available by B&NES to this document itself, the process is highly prescribed. A vast gap exists between the offer of freedom to participate in local developmental processes, and offering up a pre-determined set of authorised choices. This Strategy therefore fails to offer local citizens the ability to exercise meaningful choice.

The set up is thus one of a closed system of supply and demand to which the general public are excluded. This is a centralising and bureaucratic approach which has been proven time and time again to fail more often than it succeeds. It can be summarised in the following way: governments must never pick winners. This document does pick winners almost universally. Throughout we are offered up a pre-determined vision for a) where development must occur and b) what type of development must occur at these pre-determined sites.

Ultimately my overriding objection to the document in general is that it fails to represent best practice. The agenda for the local authority should be the supply of pertinent objective information to its citizens in order for them to make informed decisions. It should not be about setting out centrally sanctioned, singular, authorised solutions. Any information thus provided should be provided so that the wealth producing sector can solve these issues, and provide solutions. This creates a scenario for sustainable growth of the local economy where improvement come out of incentivising the local population to experiment and innovate, creating a strong basis for local business.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 310\5 S

Respondent: The Initiative

Representation I am writing on behalf of the Initiative in Bath and North East Somerset to express our broad support

(soundness): for the latest Core Strategy Document. We have been appreciative of being fully informed of developments and grateful that many of our original observations on the original have been incorporated into the new version.

However, there are seven points that I need to raise on behalf of our members, who form a significant part of the business community.

5. We would like to note our impression that there have been occasions in the past when some Council Departments have seemed to be at odds with others. We very much hope that the Core Strategy is shared by the entire local authority.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 310\6 S

Respondent: The Initiative

Representation I am writing on behalf of the Initiative in Bath and North East Somerset to express our broad support

(soundness): for the latest Core Strategy Document. We have been appreciative of being fully informed of developments and grateful that many of our original observations on the original have been incorporated into the new version.

However, there are seven points that I need to raise on behalf of our members, who form a significant

part of the business community.

7. Finally, we would like to see even greater efforts put into encouraging more inward investment. The business community is more than willing to play its part. We could circulate material to contacts and even act as ambassadors when the opportunity arose if there was suitable literature available to distribute. I would be happy to discuss this with appropriate officers.

Yours sincerely,

W. Ian Bell
Executive Director, Initiative in B&NES.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 324\1 S

Respondent: Wellow Parish Council

Representation Wellow Parish Council wishes to record its opinion that the draft document meets the broad aims and
(soundness): aspirations of this parish. It is a sound document on which to plan for the period up to 2026.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 821\11

Respondent: Cam Valley Wildlife Group

Representation Those areas over which the Authority has influence through development management have not been
(soundness): adequately protected through planning policy, which has effectively allowed the overriding of wildlife and biodiversity value through what appears to be a 'double take' on the existing environment policies that allows development to proceed without full mitigation or compensation. The approach to B&NES-owned land and buildings has been patchy. This appears to be a resource issue, although with more attention paid to this matter B&NES could make a much more significant contribution to protecting the wildlife and biodiversity resource under its stewardship. Whilst a handful of verges have been given some protection to protect Bath Asparagus, B&NES has failed to ensure that there is a comprehensive and robust system for the identification and protection of important species associated with its landholdings and buildings. For example, work was conducted on Victoria Hall, Radstock, which supports several important bat roosts, including a maternity roost, yet the Department in control had no idea of the existence of the roosts, despite other departments in B&NES being closely involved with the planning of the development in question and monitoring it through Major Projects.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 821\20

Respondent: Cam Valley Wildlife Group

Representation Locational investigations.

(soundness): The location of development depends to a certain extent on the availability of land and the strategic aims for development in the various locations in the Authority, especially the main urban areas. The capacity of these areas to absorb housing and other development has a bearing on the overall

locational strategy, including the size and location of urban extensions and town centre developments. The Housing Land availability assessment is one of the tools the council has used when making these decisions. However, makes no mention of the assessment of wildlife value within its methodology, and so is not robust when it comes to assessing land availability and likelihood of delivery. Either the Council has not provided any biodiversity audit or wildlife resource assessment and information on sites to the assessors or they are failing to take known wildlife and biodiversity into account, which we believe may act against current guidance. The Green Spaces Strategy and Landscape assessments are of little help with regard to wildlife and biodiversity matters and representations have been made on the Launch document to the Authority setting this out.

We note that individual assessments in the Appendices of the Strategic Housing Land Availability Assessment (SHLAA) assume that if outline permission has been granted that this proves the site's suitability for housing development, and assume that this also applies to all the other individual assessments in B&NES. We do not agree that this can be assumed. In the case where outline permission has been granted but it proves to be impossible to meet the Section 106 conditions of consent, this would not be the case. Neither would it be the case where a 'wrong' decision had been made by the planning authority which could not be legally challenged. We believe this to be the case on both counts, for example, with the Radstock Railway Land development (RAD1), where outline conditions have not been shown to be 'achievable' and where several are still not agreed .

We believe that there is support within planning guidance for a proper assessment of sites, whether or not they have an existing permission and that this should be exercised. A similar argument was made for site allocation in the B&NES Local Plan process for at least one site, which resulted in no assessment regarding the sustainability of development on that site, despite its extremely high biodiversity value in district, regional and national terms. A senior planning officer expressed surprise that the site had not been weeded out in the housing land availability study process and that the assumption had been made that the site was suitable for housing development on the basis that the site had been allocated for some time and that an outline consent had been granted in 1999; subsequently, upon examination of the Local Plan, the Inspector deemed the biological value and the community value associated with that value to outweigh the site's re-use for regeneration. We believe that there is a danger of the Authority treading in its former footsteps with regard to sites that are deemed, through extant outline permissions or former plan allocation, to be "suitable" for accommodating housing development. This, we believe is already evidenced by the way that sites are dealt with in the SHLAA. The SHLAA applies to sites across the Authority and has a bearing on housing allocations to each area. This could make a significant difference to the strategy, especially where housing numbers attributed to individual sites are significant or the site is playing a strategic role, as is the case with RAD1. Therefore, we would like to see the Authority, as part of the appraisal of the Draft Core Strategy, undertake a review of all sites that are assumed to be suitable for development because of either an existing outline consent or because of a previous outline consent. We believe that the methodology in the SHLAA is fundamentally flawed.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 822\1

Respondent: Somer Valley Friends of the Earth

Representation We consider the strategy to be unsound because insufficient baseline information has been used at all
(soundness): stages in its production, which has resulted in the failure of the Sustainability Appraisal to be capable of adequately appraising the sustainability of the Strategy and the inability of members of the public to engage in the consultation process adequately; development of the LDF and of the Core Strategy is meant to be front-loading evidence-based process that enables the public and others to make properly informed comment - this has not been the case with the development of the Core Strategy. We do not believe that planning officers have had sufficient time in which to produce a cohesive evidence-based

strategy because of the lack of baseline data earlier on in the process and that this has led to an unbalanced strategy

Change sought to make sound: All the baseline information needed to inform decisions about strategic proposals and policies in the Core Strategy should be provided by the Council in order that the nature and location of development in the District can be adequately consulted upon and decisions re-visited. This would help to mitigate the problems that have arisen due to the failure to follow the front-loading procedure; it would allow the public, planning officers and councillors to move closer to the the level of involvement that the process outlined in PPS 12 aims to enable. We believe that the options should be re-assessed in the light of the full gamut of baseline information and that major decisions such as that to locate a greater proportion of development in the Somer Valley and important strategic matters could then be re-visited. This would not make the Core Strategy sound, but would enable a process capable of delivering a sound strategy. This could possibly happen through the Inquiry process. The alternative for the Somer Valley area, we believe, is to go for the lower level of development proposed in Option 1 of the spatial options stage, as the Sustainability Appraisal does at least say that this is the more enviromentally sustainable option. In the light of the obvious increase in the imbalance between jobs and houses in an area where is is already severe, this seems to be the more precaustionary approach, and so is the one we would favour in the case where information was not brought forward and further analysis and consultaiton took place

Representation (legal compliance): Our opinion is that the baseline information supplied to the public has not been available to it is the right types and quantities early enough in the process and has not complied with PPS 12 in this regard; the Statement of Community Involvement includes that information is provided to the public and we assume that this statement, although vague, means that it is compliant with Government guidance governing the production of the LDF and the Core Stratgey; we are inclined to think that, therefore, the production of the Core Strategy does not comply properly with the SCI.

Somer Valley Friends of the Earth raised the problem of inadequate baseline information with the Secretary of State at the Pre-production stage of the Core Strategy development, and received a letter from Government Office of the South West expressing its concern that indeed the council was not complying with the front-loading evidence-based approach, and its hope that the Council would rectify this before the Options stage. The council did not rectify this by the Options stage and went on to consultation and a decision upon which options would be taken forward without sufficient evidence for adequate public consultation. The evidence base is insufficient even now at this late stage and key information is not available; information needed includes data on noise and air pollution, the Green Infrastructure Strategy and a comprehensive identification of the existing green infrastructure, an audit of the biodiversity resource and condition of local wildlife sites; meaning ful data on the types of housing provision that it is feasible to provide on sites in areas such as Radstock where there is a need to address out-commuting and air quality issues; and job statistics (losses of jobs in the Radstock and Midsomer Norton area and in the Somer Valley area between 2006 and now (as the jobs increase proposed is on the 2006 level and many jobs have been lost here since 2006). Although a six week period has been given for consultation on the Draft Strategy which has included the Christmas period and so has been sub-ideal, the problems associated with the preceding stages have meant that members of the public wishing to respond to the Draft have undertaken within that six-week period a task that would have been smaller had the front-loading approach advocated in PPS12 been adopted by the Council.

Change sought to make legally compliant: All the baseline information needed to inform decisions about strategic proposals and policies in the Core Strategy should be provided by the Council in order that the nature and location of development in the District can be adequately consulted upon and decisions re-visited. This would help to mitigate the problems that have arisen due to the failure to follow the front-loading procedure; it would allow the public, planning officers and councillors to move closer to the the level of involvement that the process outlined in PPS 12 aims to enable. We believe that the options should be re-assessed in the light of the full gamut of baseline information and that major decisions such as that to locate a greater proportion of development in the Somer Valley and important strategic matters should then be re-visited.

Reference: 823\1

Respondent: New Dawn Homes Ltd

Representation (soundness): The reduction in the affordable housing threshold from 14 units to 10 units and the requirement for small sites provision on developments of 5 to 9 dwellings is :-

1. Contrary to National Policy
2. Will result in excessive costs that can not be borne by small developments
3. Will ultimately restrict the provision of affordable housing on small infill sites, by preventing them coming forward on viability grounds

Change sought to Affordable Housing policies should comply with National Standards and guidance Social Housing Grant
make sound: should be applicable to new developments

Representation (legal compliance):

Change sought to make legally compliant: