

# Bath and North East Somerset Council Draft Core Strategy Representations by Plan Reference: Chapter 6 - Core Policies

Plan Reference: Chapter 6: Core Policies

**Reference:** 292\1

**Respondent:** Bath Avon River Corridor Group

**Representation** The Group believes the Core Strategy draft to be unsound in its current form because it does not  
**(soundness):** sufficiently recognise the need for future planning strategy in the district to identify the future directions and new growth strands that will make up the future economy and understand how each of those strands can best unfold, their spatial and infrastructure requirements and how their future trajectories could be put at risk by competing land use interests. The Core Strategy must be founded on a robust and credible evidence base, and must be able to be justified and effective. The document expands on its predecessor by breaking down potential future land uses more clearly, but has not yet introduced a sufficient sense of use hierarchy, ie what uses best go where and why, focussed around optimising economic health and new job creation and this is at odds with emerging government policy which is placing the stimulation and development of economies very highly.

Whilst it is true that introducing new housing within the city boundaries is important to reducing commuting, the way the Core Strategy is written presents housing as the default option for every brownfield site and so risks having the opposite effect and magnifying the city's role as a dormitory for developing employment in Bristol. We see the lack of a Spatio-temporal economic model for new employment growth in the district as a real weakness, one likely to be exploited by Developers of the future to the districts disadvantage.

We believe the same criticism should be applied to Keynsham. If Keynsham is to grow in identity both socially, culturally and economically it needs to be encouraged to make better use of its Riverside assets as a whole rather than merely see regeneration as directed to the particular opportunities of a newly redundant site.

Throughout the length of the river corridor within the district, we believe insufficient consideration has so far been given to 'spatial sustainability'; this is the importance of understanding that to encourage more sustainable and impact accountable lifestyles, it is important to understand and lock into planning strategy, the identification of where key sustainable infrastructure activities need to go. For instance, railway stations at Oldfield Park, one potentially at Twerton, and already Keynsham have to be seen as points of developmental concentration and economic intensification. Similarly, the many weirs on the River Avon represent known and proven opportunities for power generation around which relevant activities should be concentrated. If this is not sufficiently recognised, such opportunities become sidelined by the more aggressive ambitions of residential developers exploiting a weakly defined strategy.

**Change sought to** The first report of the group due to be published in the spring of 2011 is concentrating on 5 particular  
**make sound:** strands of economic regeneration;

1. Perception change; in order for new value to be drawn from the river (social, cultural, economic and environmental) perceptions of the river have to be changed. Some of these perceptions are easily changed, such as opening up Norfolk Crescent and Green Park towards the river and creating new visual links between the river and Royal Victoria Park or towards the significant well treed landscape of Locksbrook Cemetery. Other perception changing strategies are more medium term such as supporting new uses that deliberately bring people and businesses closer to the river and see it in a new light. Unless the importance of evolving perception changing strategies is written into the Core Strategy now, property values alone could be sufficient to see all riverside sites' developed without these higher goals being achieved. Yet for Bath to compete effectively, particularly around the strength of what its University can produce aiming for the qualitative values of an Oxford or a Cambridge are important. Within the Saltford/Keynsham concept, perception changing is of fundamental importance, something that a greater awareness of the qualities of Keynsham's general

river frontages would bring. This has not yet been recognised.

2. Improving linkages; fundamental to achieving a more sustainable built environment are improving connections and linkages for pedestrians, cyclists and various modes of public and river transportation. Whilst the Core Strategy recognises some of the major infrastructure investments needed to reduce congestion and support public transport, it does not yet recognise the importance of connectivity within the Bath River Corridor and new linkages to existing developed areas beyond.

3. Renewable energy and Spatial Sustainability. The Core Strategy needs to identify more clearly the need to identify and safeguard the sites where renewable power generation is most promising with appropriate reserve land alongside.

4. Understanding the spatial and temporal developmental needs of the district's new economies. All understand that Bath's sources of economic activity and justification as a City are changing. Drivers are seen to be the Universities, their spin off companies and the associated consultancy sector. The creative sector stimulated by Bath's role as a centre of social and cultural life and changing models for the City as a visitor centre.

5. The importance of the districts economic strength working as a whole within the new West of England LEP.

But each of those strands is currently frustrated by lack of land, investment funds, housing and labour costs or some disadvantages of Bath's location in relation to transport infrastructure and other centres. We believe the Strategy needs to recognise the further work that needs to be done on understanding the optimum development pattern for each of these economic sectors, what we call the 'Spatio-economic model'. Without that as we see the Strategy already there is a real risk that planning will proceed purely on a land based point of view without realising how planning decisions are undermining the ability of the new economy to take shape as it needs to for best results. This means understanding where the economic growth points for each sector of the economy are and where land and opportunities needs to be reserved, infrastructure created, policy joined up across all sectors of the Council's work.

River Transportation. The river is at present remarkably inactive, yet increased multi-use activity is an important part of perception changing, job creation and new economic life. If there is to be new river activity the infrastructure support that needs in landings, marinas, accessibility, and riverside uses all need to be recognised as planning goals and requirements in their own right.

Beyond the urban areas, the river corridor is described within the Core Strategy as 'green infrastructure' but there is no understanding yet of what future river corridor agricultural models might need to be within a more sustainable environment. The potential for development along the river corridors in Bath and Keynsham would be enhanced by moving beyond the presently anticipated balancing flood storage model of upstream storage to a more absorbent landscape model affected by removing existing land drainage. This could support different kinds of agricultures, more appropriate to society's future needs such as wetland bio-mass, freshwater fish and wildfowl farming new water based leisure etc. The Core Strategy needs to recognise that there are rural economies to be considered and move beyond a merely land use model that puts rings around small villages and sees the landscape as merely a back drop.

In summary to make the Core Strategy sound we believe the Core Strategy needs to identify the urgent need for a Spatio-temporal economic model to guide the development of future stages of planning policy. If this is not recognised then we believe there is a very real risk of the Council's aspirations for economic replacement and renewal will fail under conventional development pressures, exploiting a weak Strategy

**Representation (legal compliance):**

**Change sought to make legally compliant:**

### Plan Reference: Paragraph 6.03

**Reference:** 224\44

**Respondent:** Bath Preservation Trust

**Representation** None of the policies consider using incentives for behavioural change. Carbon use by B&NES could be  
**(soundness):** greatly reduced if a number of these were introduced. Local transport policies should discourage public sector employees from bringing vehicles in to Bath city Centre, and could consider differential congestion charging depending on carbon emissions of vehicle. Local policies setting an environmental standard for temperatures in shop and public premises could reduce energy consumption. Policies relating to unnecessary after-hours lighting in shops, offices and streets should be considered and enforced.

**Change sought to** •Reword para 6.24 to make clear that the historic areas of the Central Zone have been designated  
**make sound:** unsuitable for district heating schemes from the supporting evidence.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

### Plan Reference: Paragraph 6.04

**Reference:** 291\4

**Respondent:** Stubbs Rich LLP

**Representation** Low Carbon Future

**(soundness):**

I agree that the carbon agenda is vital to our experience and that everything possible should be done to promote a low carbon future.

However I object to the current information of this laudable objective.

In such a fast-evolving science and technology area, policy must not lock in a specific technology, but rather set principles and objectives which the best, most economic technologies can satisfy.

**Change sought to**  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

### Plan Reference: Policy CP1: Retrofitting Existing Buildings

**Reference:** 33\2 S

**Respondent:** Ms Margaret Crossley

**Representation** Positive and substantial support to enable established buildings to greatly minimise carbon emissions  
**(soundness):** and environmental impact whilst protecting our cities heritage.

**Change sought to**  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 147\6 S

**Respondent:** Bath Green Party

**Representation** DW8 : Do you think a local policy should be developed to support retro-fitting?

**(soundness):**

Yes, given that existing properties will otherwise be emitting most of the GHGs.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 184\5

**Respondent:** Persimmon Special Projects

**Representation (soundness):** Whilst Persimmon Special Projects recognise the need to improve energy efficiency of existing buildings, we do not support the solution proposed in Policy CP1 of relying on new schemes to address retro-fitting of existing buildings.

New residential building will include energy efficiency measures, but even here technology and solutions are still evolving and consequently can be expensive to implement. Any attempt to increase the burden for contributing to energy efficiency measures off-site, which affect the viability of the project, are unrealistic. If the Policy is retained it should at least include a Viability Test.

Secondly, we consider the Policy is too vague and therefore not effective. In particular, "all schemes are to consider retro-fitting" and "measures to support this will be introduced". This is too vague and does not explain what measures are proposed to address a concept which is not easily implemented anyway. Again, the delivery box is not helpful, referring to "a range of mechanisms".

**Change sought to  
make sound:**

**Representation (legal compliance):** Persimmon Special Projects considers the Policy should be deleted.

If the Policy is retained, there needs to be a clear explanation of the measures proposed and it should be subject to a Viability Test.

**Change sought to make legally compliant:**

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**Reference:** 222\9 S

**Respondent:** Duchy of Cornwall

**Representation (soundness):** The Duchy of Cornwall supports this policy both in terms of its potential to reduce CO2 emissions as well as alleviate fuel poverty. However, we would like to highlight the potential for new developments, such as the Bath Urban Extension, to stimulate low carbon refurbishment of nearby communities by providing financial support, shared project management as well as construction resource and expertise. The proximity of Twerton to the proposed extension opens up the opportunity for the community of Twerton to benefit from the low carbon construction expertise which would be employed by the Duchy to assist with the retrofitting of energy efficiency and renewable energy measures for nearby housing most in need of this support.

There is also potential for 'allowable solutions' being considered as part of the Zero Carbon policy for new homes to be used as a mechanism to channel investment in improving the energy performance of existing buildings at area/neighbourhood level. Such an approach can harness the economies of scale required to upgrade the existing building stock in a cost effective manner.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\41

**Respondent:** Bath Preservation Trust

**Representation (soundness):** Reference has already been made (BPT submission on WHS, Policy B4) to the fact that Local Strategies should not repeat national policy, so the reference to HE1 of PPS 5 should not be made on page 53 in relation to the WHS and its setting. This also applies to CP1. PPS5 will need to be adhered to locally in any case.

On the other hand, were PPS 5 to be abolished under proposals in the Planning and Localism Bill, the pronouncements relating to climate change must also be underpinned by clear recognition in the plan and supporting policies that statutory obligations to the historic environment must be respected..

The delivery framework in CP1 is not robust enough to ensure that this would be the case. Para 6.08 in the main text makes reference to there being 'scope' for detailed guidance. Detailed guidance must be a priority for our historic building stock. Acknowledgement should be given to work already underway in providing this. Without such detailed guidance, Development Management will be unable to deliver their responsibilities in this area, since many retrofitting options in the historic environment will require planning permission and/or listed building consent.

CP1 mentions the possibility of retrofitting on a whole street basis. It is not made clear how this can be delivered without complex and specific investment for facilitation across multiple freeholders. Its deliverability can therefore only be regarded as an aspiration.

The impact of some retrofitting options on Conservation Areas must be discussed and acknowledged. While the amendments to the GPDO have increased permitted development in non-listed buildings, account must be taken of the impact of such interventions on the historic environment. The Council can declare an Article 4 direction in relation to the WHS to manage developments that individually or cumulatively would harm the OUV and in certain cases relating to Climate Change this approach should be actively considered.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 246\4 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.

26.Policy CP1.  
Page 105 paragraph 6.05  
Page 106

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 252\5

**Respondent:** Cadbury Kraft Foods

**Representation (soundness):** 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.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 279\7

**Respondent:** English Heritage

**Representation** CP1 Retrofitting.

**(soundness):** To assist the effective delivery of this policy we would encourage the completion and ratification of the BANES, Bath Preservation Trust and Centre for Sustainable Energy Low Carbon initiative which seeks to demonstrate how carbon emissions and heating costs of Bath's historic buildings can be reduced via appropriate energy efficiency improvements.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 291\5

**Respondent:** Stubbs Rich LLP

**Representation** 6b/6.07. I support the emphasis on the retro-fitting of existing stock.

**(soundness):**

CP1. I do not support the technology specific reference to micro renewables. Our experience to date, plus much research, indicates that micro renewables are disastrously expensive. Strong support for best practice as I recommend above would make the policy more responsive to the best and most cost effective technologies without predicting what they will be.

6.15. I support the use of "allowable solutions" and offsite generation.

6.14. If best practice is followed, these costs may not be prohibitive, especially if 6.15 is considered. All development could then be obliged to take appropriate measures.

CP2.3. I support the deference to national policy, e.g. Building Regeneration, rather than embodying specific requirements in local policy.

CP2 P107. Untitled table n/c in 2019 is misleading-2016 standards apply.

CP1. That the Council "can" provide demonstration events/projects is a truism; the test is whether the Council "will". I would support the latter.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Policy CP2: Sustainable Construction**

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**Reference:** 147\7

**Respondent:** Bath Green Party

**Representation** DW10 : Do you agree with the threshold (10 dwellings, above which developers should have to apply (soundness): the on site renewable energy generation targets)?  
No. There is a great urgency to this matter.

11 :Do you agree that major development should meet higher targets than national standard?  
Yes, and we think that all developments should meet CSH 6 from now on.

DW12: Do you agree with the threshold or should it be lower?  
It should be lower.

**Change sought to make sound:** Developers must provide ALL new dwellings with sources of renewable energy  
**make sound:**  
All developments should now meet CSH 6.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 147\8

**Respondent:** Bath Green Party

**Representation** DW13:Should the Checklist be required as part of planning applications?  
**(soundness):** Yes

DW21: Does the proposed core policy for high quality urban design include all the necessary elements?  
Developments must be built to be long-lasting and very resilient, as once oil availability begins to decline it will become extremely expensive to repair/rebuild. So longevity needs to be designed into the developments from the outset.

Minimum space standards for private housing (Page 53)  
We recommend all options.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 180\17

**Respondent:** J S Bloor Ltd

**Representation** Policy CP2 Sustainable Construction is considered unsound as it includes a timescale when Codes for (soundness): Sustainable Homes will be expected to be adhered to. Previously in response to the Spatial Options Consultation, Bloor Homes had indicated that the changes to the Building Regulations in 2010, 2013 and 2016 will allow for the opportunity to adjust policy in light of experiences. This is particularly significant given that there are acknowledged issues in terms of the technology being available in a useable form on a volume scale. The policy framework developed will need to be capable of dealing with changing circumstances. It is the industry's view that by 2016 Code Level 4 will be achieved rather than Code Level 6 and in doing so there will need to be some flexibility depending on the local circumstances and national context. Achieving Code Level 5 will add significantly to costs and basically as the number of dwellings decreases the cost per unit rises and there will come a point between £20,000 and £30,000 per unit where the community energy ceases to be the most economic solution.

**Change sought to make sound:** Consideration should be given to what are realistic in terms of deliverable targets for the Code for  
**make sound:** Sustainable Homes.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 222\10

**Respondent:** Duchy of Cornwall

**Representation** The Duchy is broadly supportive of this policy.

**(soundness):**

The Duchy of Cornwall agrees with the aspirations set out in achieving CSH level 6. However, it is concerned that this may preclude other approaches, which take a broader view of sustainability, such as transport and food provision. To remedy this, the Duchy would like to see a requirement for Code for Sustainable Homes level 6 or agreed equivalent.

With regard to 'Minimisation of waste and recycling during construction and operation' the Duchy agrees with the need to minimise waste. However, the way the policy is worded suggests that recycling also needs to be minimised, and the Duchy does not agree with this. A better statement would be, "minimisation of waste and maximise recycling of any waste generated during construction and operation."

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 244\2 S

**Respondent:** Home Builders Federation

**Representation** We welcome the decision to adhere to the Government's programme toward zero carbon homes from

**(soundness):** 2016, and not to accelerate this. We also welcome the flexible approach towards defining "allowable solutions" to accommodate the anticipated changes that are expected to come from Government.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 245\6 S

**Respondent:** Environment Agency

**Representation** We are pleased to see the inclusion of a sustainable construction policy to inform the development

**(soundness):** management process and that this has made reference to the need for water efficiency in new development. Planning for the sustainable use of water resources to meet demand from new development is critical given the likely future pressure on water resources in light of climate change and the need to maintain river flows to meet Water Framework Directive requirements.

The inclusion of pollution prevention and land contamination requirements in CP2 or as another Core Policy would have been welcome. Particularly given its inclusion in strategic objective 2 of the Core Strategy and the fact that many of the policy areas are promoting development on brownfield areas close to vulnerable water resources. However it is appreciated that this may have been considered to add little to the requirements already set out in PPS23.

**Change sought to make sound:** N/A

**Representation (legal compliance):**

**Change sought to make legally compliant:** N/A

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**Reference:** 248\11

**Respondent:** Crest Strategic Projects and Key Properties Ltd

**Representation** 1) RPS is broadly content with the wording of the policy. It would however be helpful to have

**(soundness):** references to flexibility and viability. Bristol City Council, following examination, has added text to make



clear, "An exception will only be made in the case where a development is appropriate and necessary but where it is demonstrated that meeting the required standard would not be feasible or viable." "If meeting the full requirements of Policy BCS14, either through on-site measures or allowable solutions, would render development unviable, careful consideration will be given as to whether the development is appropriate in other respects and sufficiently necessary o justify an exception to the requirements of Policy BCS14."

2) In respect of the Sustainability Checklist, if it is being use as part of planning applications, there needs to be a clear statement of what the purpose is and how it will be used, ie whether it is to be used as a tool to raise awareness or to set a standard to be achieved. For instance, initially it might be best for developers to simply to use it and then in 2012 for all developments to achieve a Good in 50% of the categories, in 2016 achieve a Good in 50% of the categories, and Best in 25%.

3) The best use of the checklist would be for demonstrating sustainability, with the Council stating what it deems to be acceptable level of performance for sustainability to avoid the checklist simply being a "tick box" exercise. Developers should be allowed to use other means to demonstrate their development meets the sustainability requirements, although the onus would be on them to demonstrate they meet the requirements as determined within the Checklist. In reality, most would use the Checklist, but it does give the flexibility for developments which are more sustainable than others, but do not fit in to the typical approach, to demonstrate they meet the Council's requirements.

4) The Council needs to ensure that the Checklist remains up to date, both in terms of the level of questions etc, and also in terms of the acronyms and associated documents. For instance, reference to the ODPM suggests that the Checklist is out of date, where as in fact the technical content may not be.

**Change sought to** 1) Changes similar to those advocated by Bristol City Council should be worked into the CS to ensure  
**make sound:** deliverability and flexibility.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 252\6

**Respondent:** Cadbury Kraft Foods

**Representation** Renewable Energy and Sustainable Construction Policy CP1 'Retrofitting existing buildings', Policy CP2 '**(soundness):** 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.

**Change sought to**  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 254\6

**Respondent:** Galliford Try plc.

**Representation** Policy CP2

**(soundness):**

6.11 In addressing climate change the Core Strategy should be more explicit about the role of flexible and adaptable buildings.

**Change sought to** Revise the housing target for the district to reflect more realistic growth and inward migration  
**make sound:** assumptions, and adopt a less prescriptive approach to new residential led proposals in the Somer Valley Area.

**Representation (legal compliance):** 1: Not Justified: In terms of the evidence base relating to the housing requirement for the district, or in relation to the definition of the Midsomer Norton Town Boundary.

2: Not Effective in terms of strategy: delivery of housing and employment under Policies SV1 and SV2.

3. Not Consistent with National Policy? PPS3, PPS4 and PPS12 (deliverability and flexibility).

**Change sought to make legally compliant:**

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**Reference:** 263\3 S

**Respondent:** Wessex Water

**Representation (soundness):** We note and support the policies pertinent to our responsibility: CP2

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 269\5

**Respondent:** Barratt Homes Bristol

**Representation (soundness):** Policy CP2 - Sustainable Construction

Objections are lodged against the inclusion of a table setting out the standards required to be met by major development. The Coalition Government is currently considering the removal of the raft of existing building standards which place additional burdens on the development industry. It intends to create a simpler, less costly system of building standards. Until such time that the new system of regulation is established, it is considered that these local requirements should be removed and national regulations relied upon.

**Change sought to make sound:** Removal of table in Policy CP2.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 270\5

**Respondent:** Blue Cedar Homes

**Representation (soundness):** Policy CP2 - Sustainable Construction

Objections are lodged against the inclusion of a table setting out the standards required to be met by major development. The Coalition Government is currently considering the removal of the raft of existing building standards which place additional burdens on the development industry. It intends to create a simpler, less costly system of building standards.

Until such time that the new system of regulation is established, it is considered that these local requirements should be removed and national regulations relied upon.

**Change sought to make sound:** Removal of table in Policy CP2.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 291\6

**Respondent:** Stubbs Rich LLP

**Representation (soundness):** cp2/4. I support the establishment of flexible mechanisms and believe this should be the policy direction.

6.17 Renewable energy research "must" not "may" be updated. I support the former.

CP3 Development "must" contribute. I support this. However, it is unrealistic that development will achieve anything like the renewable targets of 1.12, 6.06 and 6.16. It would be more useful to the electrorate if the proportion required from retrofitting was made explicit.

6.20. Contains the crucial determinant of DH efficiency: the heat load. If the load is intermittent .e.g.absence of heating requirement in the summer, diurnal fluctuations in residential occupancy (everyone at work, therefore heating not required), then the efficiency drops. Also see Professor David Mckay's explanation of the Physics of CHP. The practical ratio of heat: electricity over an annual cycle is more like 4-6:1, where residential demand is more like 1:1.2., with electricty dominant.

6.21. It is true that the heat source can change over the life of DH: the former has an economic life of 15-30 years, the latter 100 years.

6.22. This assertion on DH costs is quite different from figures I have seen.

6.23. Perversely, the use of Vaults for heating pipe work is likely to reduce installation costs, although I agree that doing so might have a negative heritage impact.

CP4. I object to this technological solution being made policy.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 297\11

**Respondent:** Bath Rugby Club

**Representation (soundness):** Page 107, Policy CP2

In order to ensure that the Core Strategy Is flexible and achievable and therefore effective, Policy CP2 should make reference to the vaibility and feasibility implications of requiring BREEAM excellent Including zero carbon and recognise that this approach should be applied flexibilty In order to take Individual site and development circumstances Into account.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 300\2

**Respondent:** Somer Housing

**Representation (soundness):** Policy CP2 – Sustainable Construction

6.1 We welcome the Council's commissioning of a viability study of its sustainable construction requirements, as per our previous recommendations.

6.2 We still consider that the Design and Access Statement which accompanies major developments should set out that the most suitable technology has been chosen for each development. In particular we are concerned that developers may try to meet the standards in the cheapest way, which can later cause management and maintenance issues for future residents or housing associations.

6.3 This could easily be accommodated in the supporting text of this policy, which would state that: ' Applicants will be required to demonstrate in documentation supporting their applications, that the most suitable technological design and construction techniques are used for each site. It should also demonstrate that the technology chosen will be easy and practical to use and maintain in the longer

term.'

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

#### Plan Reference: Policy CP3: Renewable Energy

**Reference:** 147\5

**Respondent:** Bath Green Party

**Representation** B&NES is to be praised for commissioning the CAMCO report and for being prepared to lead the way in  
**(soundness):** developing renewables. However, in defining the Target levels for renewable energy, the CAMCO report fails to acknowledge the need for the type of fundamental change demanded by PPS1. The CAMCO target recommendations are not far-reaching enough and do not respond to "climate change is the greatest long-term challenge facing the world today".

It is imperative that we aim for as near the technical potential as possible. This is what PPS1, the Government and current evidence demands. Additionally, there must be scope for increasing targets as new technologies evolve. We must at least meet the UK national targets for 2020 (32% electricity, 14% heat). Concerning energy from biomass - this will be limited by the supply of biomass; we cannot rely on imports because surrounding areas will need their biomass to meet their own needs.

There must be a fundamental shift in the planning process for the installation of renewable energy supplies. Planners should comply with PPS1 to achieve the greatest renewable supply and to encourage and facilitate construction of renewable supplies. Renewable energy sites should be situated where their potential is maximised. Community groups should be encouraged, supported and facilitated, as projects initiated and backed by the community will prosper - as they do in the Scandinavian countries.

DW9 : Do you agree with the targets (for on-site renewable energy generation) suggested by research?  
No.

There is a great urgency to this matter. There must be a fundamental shift in planning policy to meet PPS1 "KEY PLANNING OBJECTIVES . To deliver sustainable development, and in doing so a full and appropriate response on climate change ... secure the highest viable resource and energy efficiency and reduction in emissions; " Given that any new developments will be around for many years to come, they should be developed such that their energy needs are met without emitting GHGs. Given that we are going to struggle reducing emissions to meet the needs of existing housing/businesses, let's not make life harder for ourselves – all new developments must be able to meet their needs without GHG emissions.

However, the location of the source of the energy should be one that allows the most efficient production of the energy – it is pointless putting up wind turbines on-site if there is not sufficient wind, but the developer can put up a turbine in another area where there is sufficient wind.

**Change sought to** B&NES must set targets approaching the technical potential to achieve that which is demanded by the  
**make sound:** Key Planning Objective in PPS1 "To deliver sustainable development and in doing so a full and appropriate response on climate change."

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 217\2

**Respondent:** National Grid Property Holdings Ltd

**Representation** 2) Effective  
**(soundness):** Deliverability

National Grid (NG) previously made representations to the Core Strategy Spatial Options Consultation in 2009. In these representations, it was emphasised with regard to renewable energy targets that any Policy should allow for some flexibility on sites which have significant development constraints, where the costs of delivery renewable technologies can affect the viability of a scheme. National Grid (NG) are committed to working with the Council, other landowners and stakeholders to deliver the redevelopment of the Midland Road / Windsor Bridge Road site, which offers a highly sustainable location for development which would contribute to the wider regeneration of the Western Riverside Area. Draft Policy CP3 suggests that development should contribute to achieving minimum levels of Renewable Electricity and Heat generation by 2026, with 110MWe for electricity and 165MWth for heat.

Whilst NG are generally supportive of this policy approach, the site at Windsor Bridge Road is subject to significant development constraints, particularly the considerable remediation costs associated with the decommissioning and removal of the gasholders, and the remediation of the land. As such, it is important that the policy allows sufficient flexibility in terms of meeting renewable energy targets, where such requirements are likely to compromise the likelihood of certain sites – like the NG site at Windsor Bridge Road – being brought forward for development. Draft Policy CP3 is not therefore effective as it may serve to be a deterrent in bringing the prominent, sustainably-located brownfield site at Windsor Bridge Road forward for redevelopment.

#### Flexibility

The proposed policy is too restrictive whereby it sets out a minimum level of renewable energy to be achieved as part of any new development. As detailed above, the redevelopment of the NG land at Windsor Bridge Road will be subject to significant abnormal costs associated with the decommissioning of the existing gas holders, and the subsequent remediation of the land. These factors, combined with current economic conditions, are likely to have a significant effect on the viability of any future development of the site. As such, some text should be including stating that, where development constraints may result in abnormally high development costs impacting upon the viability of redevelopment, a reduced level of renewable energy may be acceptable.

#### 3) Consistent with National Policy

The rehabilitation of contaminated sites is supported by PPS1 entitled 'Delivering Sustainable Development' which seeks to promote the re-use of brownfield sites for development in conjunction with the goal of making suitable land available for development, in line with economic, social and environmental objectives. There are benefits in terms of meeting sustainable development objectives and reducing the threat posed to health and the environment by remediating contaminated brownfield sites. However, the substantial costs associated with decontamination can lead to a situation whereby the costs are so prohibitive that it is not financially viable to bring a site forward for development.

Paragraph 26 of PPS1 states in regard to development plans that they should:- "(iii) Not impose disproportionate costs, in terms of environmental and social impacts. Or by unnecessarily constraining otherwise beneficial economic or social development."

Furthermore, DETR Circular 01/2006, entitled 'Contaminated Land', sets out objectives for such land:

- To identify and remove unacceptable risks to human health and the environment;
- To seek to bring damaged land back to beneficial use; and
- To seek to ensure that the cost burdens faced by individuals, companies and society as a whole are proportionate, manageable and economically sustainable.

DETR Circular 02/2000, 'Contaminated Land' (now superseded by DETR Circular 01/2006, Contaminated Land) provided the policy framework behind PPS23, Planning and Pollution Control. It may not be feasible for a developer to pay for the substantial remediation costs required in addition to the costs of

development, and the often heavy financial burden of S106 contributions. Such a sum may be deemed disproportionate and in those circumstances may not be in compliance with either PPS1 or DETR Circular 01/2006.

If sites are not developed they cannot contribute to 'the maintenance of high and stable levels of economic growth and employment'. In its current form, by requiring a form of development which is not viable, draft Policy 16 is contrary to the economic principles of PPS1. The issue of whether remediation costs should be taken account of when assessing viability was considered by the Planning Inspectorate in an appeal (ref: APP/C4615/A/08/2066072) at the Former Gas Works, Constitution Hill, Dudley (allowed 13th August 2008). The appeal related to the redevelopment of the site for 162 residential units. The Inspector outlined the main issue when he stated in paragraph 12:- 'A major consideration within the viability reports undertaken is the expenditure involved in remediating the site, and there is significant allowance for the abnormal costs which would arise because of the particular characteristics of the site'. He went on to state:-  
'An issue of major significance in assessing the validity of the viability studies is whether the costs of this remediation, amounting to £2.85m, should be deducted for the potential value of the completed development in assessing the residual land value, and thus the economic viability of the alternative developments under construction'.

It was the Council's position that the "polluter pays" principle should be applied, on the basis that the appellant or its predecessors had benefited from the profits that arose from the pollution of the site:- 'It should thus meet the cost of remediation from its current assets to which these profits have contributed. The Council considers that the "polluter pays" principle is supported by the EPA.' After considering the evidence the Inspector concluded in paragraph 17 of his report that:- '... it is appropriate for the costs of the voluntary remediation of the site to be taken into account in assessing the viability of different forms of development on the site. It further seems to be reasonable and correct that, by extension, the costs of further remediation and abnormal works, arising from the nature of the land and its past use but relevant to the particular form of development being assessed, should be taken into account in the same way.'

This appeal decision establishes a precedent that it is appropriate for planning decisions to take account of the abnormal costs of remediation works. Likewise, it is fair and reasonable that the policies should take into account the high costs of remediation. In addition, and in the context of the above, it is also important to consider such abnormal costs in considering renewable energy requirements. Whether this is in the Core Strategy, or other DPD, the policy wording must ensure that specific mention is made of the fact that renewable energy levels will be sought having regard to economic viability and site specific circumstances. This is to ensure that the policy is sufficiently flexible to be responsive to matters such as abnormal costs which will arise in bringing sites forward for development, and to ensure accordance with the requirements of PPS3. Where open book viability assessments are required, provision should be made for those circumstances. Where an open book assessment cannot be made publicly available this information may need to be treated on a confidential basis.

**Change sought to make sound:** In order to make the policy sound, the following text should be added:  
**make sound:** • Where sites are subject to abnormal costs, such as those associated with the remediation of contaminated land, there may be scope for flexibility in judging these targets, where the costs of delivering renewable technologies will affect the viability of redevelopment.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 222\11

**Respondent:** Duchy of Cornwall

**Representation (soundness):** The Duchy of Cornwall considers that the key to delivering zero carbon homes, which in turn would

contribute in delivering the ambitious renewable energy targets outlined for 2026, is having a comprehensive plan for both on and offsite CO2 reduction solutions.

In the case of the Bath Urban Extension, the Duchy is in an ideal position to bring forward opportunities for off-site renewable energy generation, which can potentially be used as 'allowable solutions' to offset any residual carbon emissions from the development. Locally owned land could be used for standalone renewable energy generation, such as anaerobic digestion plants converting waste to energy and retaining nutrients for re-use on the land as low odour fertiliser. Additionally, the location of the development within an extensive Duchy of Cornwall owned hinterland provides the opportunity for the development to be supplied with renewable fuel sourced from Duchy owned woodland and/or farmland that can be used to provide a proportion of the development's renewable energy demand, either on or off site.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 223\2

**Respondent:** Transition Bath Food Group

**Representation (soundness):** The Core Strategy recognises that agricultural production needs to be increased to ensure food security and economic growth.

The delivery of District Heating proposed in paras 6.19 - 6.24 relies too heavily on combined heat and power (CHP) derived from biomass. Camco's Renewable Energy Research and Planning Update, November 2010, on which the District Heating section is based, mentions (in para 5.1.3) that agricultural land "used primarily for food crops" would be protected, but then lists financial incentives for farmers to grow biofuels. Its recommendation for biomass use is further predicated on the expansion of biofuel crops, but land is a finite resource. The report calculates that fuel crops and thinning from non-ancient forestry would equate to 43% of potential resource, with animal manure, straw, council green waste collections (all materials which should be used for growing food), forming a further 38% of biomass potential. In total, therefore, it is assumed that 81% of biomass potential will come from land and products which are currently are, or should be, used for food production.

One of the reasons for the increase in the global price of wheat is that 25% of cereal production in the USA is now used as biofuel (US Department of Agriculture figures for 2009) and, according to the UK's Agriculture and Horticulture Development Board, the three UK biofuel refineries that are expected to be fully operating by 2014 alone will require 3m tonnes, i.e. one-fifth of the wheat produced in the UK. CHP from biomass also depletes potential food production.

The emphasis in Policy CP3 should be on maximising the potential of both wind power, geothermal power and hydropower, not on CHP from biomass.

**Change sought to make sound:** For the Core Strategy to be sound, an additional point should be added to Policy CP3:

renewal energy opportunities will not be considered if they threaten existing or potential food production.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\42

**Respondent:** Bath Preservation Trust

**Representation (soundness):** CP3 relies on the Development Management process for delivery of the renewable targets, Yet without research and guiding detailed policies (for instance for the most effective and least visually intrusive locations for wind turbines) Development Control will be unable to act other than in a piecemeal and

non-strategic manner. For example, the supporting study on Landscape Sensitivity analysis for Wind Energy Development in B&NES describes in great detail the views to be preserved, the need to respect the WHS setting and the risk of a cumulative effect of Wind Turbine Development: it falls short however of recommending (either for or against) in particular areas (though does rule out the urban environment).

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 252\7

**Respondent:** Cadbury Kraft Foods

**Representation** Renewable Energy and Sustainable Construction

**(soundness):** 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.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 254\7

**Respondent:** Galliford Try plc.

**Representation** Flexibility for new buildings and sites to adapt to new renewable energy technological innovation

**(soundness):** during the plan period and beyond should be explicitly recognised.

**Change sought to make sound:** Revise the housing target for the district to reflect more realistic growth and inward migration assumptions, and adopt a less prescriptive approach to new residential led proposals in the Somer Valley Area.

**Representation (legal compliance):** 1: Not Justified: In terms of the evidence base relating to the housing requirement for the district, or in relation to the definition of the Midsomer Norton Town Boundary.  
2: Not Effective in terms of strategy: delivery of housing and employment under Policies SV1 and SV2.  
3. Not Consistent with National Policy? PPS3, PPS4 and PPS12 (deliverability and flexibility).

**Change sought to make legally compliant:**

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**Reference:** 266\18

**Respondent:** The Bath Society

**Representation** Policy CP3 Renewable Energy , including CP4 proposals for District Heating are laudable though very

**(soundness):** ambitious . There are significant limitations to what a local planning authority is able to request or achieve

Responding to climate change [Policies CP1 – CP5]

These responses appear sensible and pragmatic, using the most up to date data and approach. There



are however significant limitations to what the local authority can either achieve or request. CP3 Renewable Energy including proposals for district heating [ CP4 ], is laudable though very ambitious. The Authority's 'enhanced role' in terms of flood risk management [ CP5 Flood Risk Management] has been prescribed for it by new statute ( Flood & Water Management Act 2010) and it is to be hoped that it will have the resources to meet these extra responsibilities. We regard the 'Flood Risk Management Strategy' , especially as it affects the centre of Bath, as being of critical importance. See our detailed representations on this topic.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 276\1

**Respondent:** Hignett Family Trust

**Representation (soundness):** The Council's overall objectives to address climate change and reduce CO2 emissions in the face of planned growth in jobs and homes means that renewable energy must form a key role in securing this objective. The current performance of the District is woeful and therefore the policy should create a stronger requirement between new major development and the provision of renewables, so that delivery of low carbon technology is secured. The approach of the Council towards secure renewable targets should be aligned in the same way as affordable housing. Delivery through Section 106 agreements attached to residential/ commercial development should be part of the Councils strategy.

The capacity of the New Neighbourhood to make a contribution should be recognised., particularly where the other major scheme at Bath , BWR , fails to secure renewable energy sources. ( Amend the policy wording). The policy states that "Development should contribute to achieving the following minimum level of Renewable Energy and Heat generation by 2026:

110 Mwe (Megawatt Electricity)

165 MWth (Megawatt Thermal)".

Whilst the CS proposes development at a number of locations it does not make clear how such substantial targets for Renewable Energy are to be delivered in practice over the coming 15 years.

In the case of the proposed New Neighbourhood at Odd Down, the site is already crossed by the appropriate electrical infrastructure namely a 33Kv cable bringing power into the City from the south. Photovoltaic generation, whether from roof fixed cells on commercial and residential premises, or from ground mounted equipment (producing approximately 120Kw per acre) may thus be fed into the grid with minimal inconvenience, thereby assisting both in achieving the Council's CP3 target and also ensuring that the New Neighbourhood as a whole is carbon neutral or positive. The likely estimate of capacity at the New Neighbourhood is upto 1-2 MW.

HFT are already growing biomass (miscanthus which is used for renewable heat generation) on a commercial scale elsewhere within B&NES.CSSO Part 1 This locally sourced energy could find itself in the renewable mix at the New Neighbourhood. HFT are endeavouring to obtain the necessary consents to generate electricity through micro-hydro also within B&NES. Each of these activities will assist towards the delivery of these challenging targets.

**Change sought to make sound:** Amend Policy CP3 by adding the following at the end of the policy:

**make sound:** "e. the need to provide renewable energy in association with major, mixed-use development including at the New Neighbourhood."

Add to delivery text new item 6.

" 6. Renewable energy schemes will be required at major residential schemes to reduce their carbon footprint . The Council will support such a scheme at the New Neighbourhood at Odd Down

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 292\13

**Respondent:** Bath Avon River Corridor Group

**Representation** Policy CP3 p108 Insufficient consideration of the need to identify and protect locations likely to be key  
**(soundness):** to geographic renewables in a strategy that is setting land use hierarchies.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 297\12

**Respondent:** Bath Rugby Club

**Representation** Page 108, Policy CP3

**(soundness):**

The targets for renewable electricity and heat In this strategy may place a significant burden on the developer. This could lead to desirable development being Unviable.

While we note that the policy requires all development to contribute to an overall target for renewable electricity and heat by 2026, further flexibility should be Incorporated Into the policy to ensure that the policy accords with the principles of being effective. Such flexibility should refer to the viability and feasibility of meeting the targets In order to take individual site and development circumstances Into account .

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 315\2

**Respondent:** Charlcombe Parish Council

**Representation** Policy CP3 addressed renewable energy in only the broadest of terms. Wind Power is the most visible  
**(soundness):** and visually intrusive form of renewable energy and there needs to be a clear strategy on how the use of wind power is to be developed within B&NES and what the planning criteria are for the siting of wind turbines. Without such a strategy, there is a significant danger of ad hoc installation of wind turbines in a way which is neither visually acceptable within Bath's surrounding environment nor effective in terms of energy generated. Indeed, B&NES has in the last 12 months already given approval to the installation of a single wind turbine on Lansdown, in the parish of Charlcombe, the first such installation close to the city, and there is a significant risk of more being approved in a random and piecemeal fashion, to the detriment of Bath's world heritage setting.

**Change sought to** Policy CP3 needs to be expanded to include a clear strategy for the justification and siting of wind  
**make sound:** turbines.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Plan Reference: Policy CP4: Distric Heating**

**Reference:** 102\3

**Respondent:** Federation of Bath Residents' Associations

**Representation** FoBRA believes it is neither legal nor sound to proceed with this policy at present. There has been no  
**(soundness):** consultation or discussion on this issue, and the breezy comment about mitigating any negative impacts on vaults in central Bath in para 6.24 is quite inadequate.

**Change sought to make sound:** Promote discussion and hold consultation on this issue.

**Representation (legal compliance):** FoBRA believes it is neither legal nor sound to proceed with this policy at present. There has been no consultation or discussion on this issue, and the breezy comment about mitigating any negative impacts on vaults in central Bath in para 6.24 is quite inadequate.

**Change sought to make legally compliant:** Promote discussion and hold consultation on this issue.

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**Reference:** 184\6

**Respondent:** Persimmon Special Projects

**Representation (soundness):** The Policy is not effective due to the lack of clarity. It is not clear whether the measures set out apply to just the District Heat priority areas, or to all development throughout the Core Strategy area. If the Policy applies to the whole area, Persimmon Special Projects object because there would be practical difficulties and viability issues with providing District Heating Schemes in all development.

Even so, it should allow for site specific exceptions where provision of District Heating could be difficult to achieve, or unviable, or where other solutions would be better in order to introduce some flexibility into the Policy.

**Change sought to make sound:** Persimmon Special Projects request the changes to the Policy as described in Section 6b.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 221\1

**Respondent:** Wm Morrison Supermarkets Plc

**Representation (soundness):** Policy CP4 requires all major developments to demonstrate that CHP/CCHO systems have been selected in accordance with a heat hierarchy. The policy does not define what major development is, and provides no flexibility to cater for circumstances when the provision of CHPO/CCHP will not be suitable or viable. For example, one such circumstance might be when an extension is proposed to an existing building with established non CHP/CCHP heating systems.

There are numerous approaches and technologies available that can deliver efficient and sustainable energy/heating to buildings without the need to rely on CHP/CCHP. Policy CP4 should be sufficiently flexible to allow these alternative to be considered.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 222\12

**Respondent:** Duchy of Cornwall

**Representation (soundness):** The Duchy of Cornwall considers that the key to delivering zero carbon homes, which in turn would contribute in delivering the ambitious renewable energy targets outlined for 2026, is having a comprehensive plan for both on and offsite CO2 reduction solutions.

The Duchy of Cornwall notes that Twerton has been identified as one of the District Heating Priority Areas under this policy. The District Heating Opportunity Assessment study by AECOM concluded that the case for Twerton cluster was marginal as it does not have the critical mass or major anchor loads required for a sustainable energy infrastructure investment.

The business case for investment in district heating infrastructure, however, would be made much stronger were it to be expanded to include the Bath Urban Extension. The masterplan for the urban extension has been developed to

maximise the benefits and financial case for district heating systems, with a high density development concentrated on the western edge of the site close to Twerton. The concentrated form of the masterplan and clustering of higher density housing around the centre means lower distribution costs compared with the same number of dwellings spread over a larger area. The potential rail halt location also increases the viability of a district heating system. By siting the development close to the adjacent community of Twerton, this also opens up the potential for a shared community energy system benefiting both the Bath Urban Extension and Twerton.

Therefore, the District Heating Priority Area at Twerton should be extended to include the BUE land west of Twerton.

There may be further advantages in terms of efficiencies in management of the system and procurement of fuel, if links were also made to Bath Spa University to the west.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 223\3

**Respondent:** Transition Bath Food Group

**Representation (soundness):** The Core Strategy recognises that agricultural production needs to be increased to ensure food security and economic growth.

The delivery of District Heating proposed in paras 6.19 - 6.24 relies too heavily on combined heat and power (CHP) derived from biomass. Camco's Renewable Energy Research and Planning Update, November 2010, on which the District Heating section is based, mentions (in para 5.1.3) that agricultural land "used primarily for food crops" would be protected, but then lists financial incentives for farmers to grow biofuels. Its recommendation for biomass use is further predicated on the expansion of biofuel crops, but land is a finite resource. The report calculates that fuel crops and thinning from non-ancient forestry would equate to 43% of potential resource, with animal manure, straw, council green waste collections (all materials which should be used for growing food), forming a further 38% of biomass potential. In total, therefore, it is assumed that 81% of biomass potential will come from land and products which are currently are, or should be, used for food production.

One of the reasons for the increase in the global price of wheat is that 25% of cereal production in the USA is now used as biofuel (US Department of Agriculture figures for 2009) and, according to the UK's Agriculture and Horticulture Development Board, the three UK biofuel refineries that are expected to be fully operating by 2014 alone will require 3m tonnes, i.e. one-fifth of the wheat produced in the UK. CHP from biomass also depletes potential food production.

The emphasis in Policy CP3 should be on maximising the potential of both wind power, geothermal power and hydropower, not on CHP from biomass.

**Change sought to make sound:** For the Core Strategy to be sound, an additional point should be added to Policy CP3:

renewal energy opportunities will not be considered if they threaten existing or potential food production.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\43

**Respondent:** Bath Preservation Trust

**Representation** CP4 implies that the Central Zone will be suitable for district heating. We suspect that this is intended  
**(soundness):** to relate to new development sites on the riverside such as Avon Street Car Park, Kingsmead etc.

However the reference to ground archaeology and historic vaults in para 6.24 suggests in this draft that underlying research supports district heating in the historic zone as long as 'negative impacts' on the historic environment can be mitigated, In fact, the supporting District Heating Report (part 1: non technical introduction) rules out the historic centre because of the underground vaults;. This must be made clear in the document.

**Change sought to** • Delete references to HE1 of PPS 5

**make sound:** • Include reference to behavioural change and appropriate incentives in 6.04

- Significantly strengthen 6.08 to say that detailed guidance will be produced, in partnership with interested community organisations e.g. work by BPT/CSE.
- Significantly strengthen delivery section of CP1 to include (para 2) the fact that detailed guidance WILL be provided in form of SPD for retrofitting historic buildings
- Ensure compliance of such SPD with responsibilities under national planning legislation for protection of the historic environment
- Consider need for view management protection in light of GPDO amendments in the conservation areas, and refer to the potential for Article 4 directions where necessary.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 252\8

**Respondent:** Cadbury Kraft Foods

**Representation** 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.

**(soundness):** 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.

**Change sought to**

**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 261\5

**Respondent:** RUH NHS Trust

**Representation** Policy CP4

**(soundness):**

Policy CP4 identifies the RUH as a "district heat priority area". The Trust is currently investing more than £5m in a new gas fired CHP energy system to replace the existing outdated boilers. The CHP will serve the majority of the site. Some buildings within the site will also be provided with their own CHP (including the staff residencies).

The text in Policy CP4 states that: "development will be expected to incorporate infrastructure for district heating, and will be expected to connect to existing systems where and when this is available." The RUH site is identified in diagram 19 as a district heating hub. However, the Trust has no plans to develop a district heating system or to connect the site to a district heating system before 2026. This policy is not therefore "sound".

The policy also requires that heating and cooling systems for major development have been selected

according to a “heat hierarchy”. “Major development” is not defined in the policy and there is no indication as to how the Trust might need to address this policy in a planning application. The Trust is concerned that additional costs could be imposed on its planning application submissions if it needs to demonstrate such an approach via each major planning application. This is particularly pertinent in the context of its current investment in heat and power infrastructure at the site.

**Change sought to** Policy CP4

**make sound:** Omit the RUH from diagram 19.

Define “major development”.

Amend the policy by changing the words “expected” in the first paragraph to read “encouraged”.

Consider deleting the second part of the policy.

Provide guidance as to how applicants could demonstrate compliance with the policy.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 276\3

**Respondent:** Hignett Family Trust

**Representation** The District heating priority areas should include the New Neighbourhood at Odd Down. The location  
**(soundness):** of the strategic site alongside the Residual Waste Treatment Facility means that there are sources of supply that provide a most sustainable solution to district heating.

**Change sought to** Amend Policy CP4 by the addition of the following words at the end of the policy :

**make sound:** "6. At the residual waste facility in association with the New Neighbourhood at Odd Down’.

Amend diagram 19 to include reference to the New Neighbourhood at Odd Down ,see below

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 291\7

**Respondent:** Stubbs Rich LLP

**Representation** District Heating

**(soundness):**

In particular, I object to the emphasis on district heating (DH). This is not, of itself, a low carbon source, but merely, and only sometimes, an efficient distributor. Furthermore, it is below ground, giving rise to no visual concerns. IN respect of a district heating scheme being proposed by developers, I support paragraph 6.24 which protects the historic vaults under the city.

Being very long-lived, DH does make sense over decades which suits residential, but commercial has too short an economic churn.

The use of Spa Water might prove a valuable heat source for DH, but its high mineral content makes the water corrosive to equipment.

By way of explaining, contray to the assertion in the Core Strategy (6.23), district heating is prohibitively expensive as a retro-fit option and very expensive in new build. There is a timing risk between heat generation and heat use. Residential and commercial space has no demand for heat in the summer. I agree that it is possible to provide cooling in such systems, but there is a loss of efficiency.

The key to district heating is, of course, the heat or combined heat and power generator. If this is driven by substainable means (biomass, waste, etc.) then the system is low carbon and I support it.

However, policy must be sufficiently robust to presume in favour of the generator even more than the distribution system, since it is the generator which will create haevy vechile movements, noise, odours, fumes and visual effects - any of which could derail a proposal in a planning context.

Furthermore, there already exists a wholly adequate distribution network - electricity and gas grids and vehicle fuel. Many emerging, sustainable technologies exploit these systems directly without the need to burden the generation cost with a further expensive and rigid distribution system. For example, incineration and anaerobic digestion (AD) outputs can be fed directly into one or more of the existing distribution systems (incineration to electricity grid, AD to all three). Microalgal diesel could feed directly into fuel distribution.

The notion that heat is wasted in electricity generation is also frequently misunderstood, as ably illuminated by professor David McKay in his book "Sustainable Energy - without the hot air". Separately highly efficient generation from intermittent and seasonal use may often produce the greatest overall efficiency.

In conclusion, I recommend that the policies be thoroughly reviewed to promote best practice without predetermining what best practice will be at any given time.

I recommend a best practice incentive mechanism; say a strong presumption in favour of best practice development together with an annually published set of exemplars of the most recently achieved best practice to set the benchmark. Such a policy would be flexible, highly output driven and technology agnostic.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 297\13

**Respondent:** Bath Rugby Club

**Representation (soundness):** Page 110, Policy CP4

In order to ensure that the Core Strategy accords with the principles of being effective, flexibility should be incorporated into this policy and refer to the viability and feasibility of meeting the requirements in order to take individual site circumstances into account.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 822\2

**Respondent:** Somer Valley Friends of the Earth

**Representation (soundness):** District Heating - Radstock, Midsomer Norton and Paulton

Radstock Town Centre development numbers are small. Analysis in the Renewable Energy and Planning Research document shows that a district heating system is not considered suitable for Radstock, as nowhere is there planned the large number of dwellings that are required to make this a suitable option; the research appears to indicate that other carbon reduction methods such as photovoltaics and individual biomass boilers may be more appropriate to the sort of development that is expected in Radstock and Midsomer Norton.

The B&NES heat map provided in the research document shows the areas of highest heat demand, but does not show Radstock, Midsomer Norton and Paulton to be favourable; we note that a detailed map for Bath only has been provided in the Planning Research document, as Bath contains the areas of highest heat need. The number of dwellings that are planned for Radstock and the need to provide as high a level of affordable housing as possible in developments in this area acts against financial viability of a system primarily suited to large new-build development of 4,000 dwellings or more at 50 dwellings

per hectare (50 dph). Higher densities are expected in the central area on the RAD1 site and on the Charltons site, but even if the Old Bakery, Post Office and Library/Youth Club/Car Park expectations were added, the numbers would still be far too small and the sites are not adjacent and include separation by a river. The design of the dwellings on RAD1 is already decided and the financial viability of that development was on a knife-edge, has not managed to secure the HCA funding required, is providing a low affordable housing component and is committed through the Section 106 agreement to provide a higher affordable component if possible. We suggest that the likelihood that further public funding could be attracted to redesign this development for utilising a District Heating System is almost non-existent. Similarly the adjacent larger sites PAU1 and PAU2 already have outline permission.

The B&NES District Heating Feasibility Study identifies District Heating opportunities. We note that although the Norton Radstock College location is ruled out in the study as unsuitable, it appears as a District Heating Priority Area in the Core Strategy, along with areas in central Radstock and in Midsomer Norton which are, as far as we can determine, aspirational in nature only. The study has identified CO2 savings that can be made from gas-fired or biomass boilers in the 3 priority clusters located in Bath and Keynsham and on the assumption that gas-fired boilers will already be in use. It notes that, typically, networks are built around a core group of clients with large heat demands and explains that its intention is to over-size the networks due to the costly nature of adding capacity at a later date. It looks at commercial viability and funding sources, but does not appear to look at the matter of whether or not investment in District Heating is a better option than similar levels of investment in a range of other options, which the research document indicates are more suitable for the type and location of development envisaged for Radstock, Midsomer Norton and Paulton. We would have expected a feasibility study to consider this. The feasibility study appears to be looking at opportunities for the placement of District Heating Systems in the various locations, but not at whether this is the better option or use of resources. We think it is safe to assume that funding for energy projects will be limited and want to be sure that the best environmental and social outcome will result from decisions on renewable energy for the Somer Valley area.

We are unable to understand why, if B&NES is proposing District Priority Areas in Radstock, Midsomer Norton and Paulton, that these have not been examined in the B&NES feasibility study alongside Bath and Keynsham.

The Renewable Energy and Planning Research document suggests that there are issues B&NES must address before it can consider putting district heating schemes in place in its area. B&NES needs to show that there is a large enough supply of biomass within a 35 mile radius at most; that it is not already spoken for and could not be used in more sustainable ways; what the impact on the local environment would be when the facilities were running at peak efficiency; how much more development would be required to achieve peak efficiency for each network; what the gains in CO2 reduction would be for a network running at less than full capacity compared with at full; whether or not all any local food waste/waste materials would be used; whether locally-derived materials would be delivered straight to a unit after local collection for processing, or if a storage and processing facility would be needed outside the town centres in addition to the units themselves; what the cradle-to-cradle energy costs/benefits of the project would be; and how the investment required compares with the same level of investment in a range of other options such as biomass boilers, photovoltaics, solar-thermal energy, composting, and so on.

In addition, we are concerned regarding possible conflicts of funding. The combination of the low residual land values in Radstock and the capital cost premiums per dwelling to the developer associated with such a major renewable energy system as a District Heating System suggest that it is less likely to be a financially viable option for developers in areas where maximising affordable housing provision is necessary, such as Radstock. We fear that the placement of District Heating Systems in Radstock, Midsomer Norton and Paulton could be a driver for massive development around the DHS locations in order to promote viability and justify investment. We are not convinced that CO2 savings would justify the high environmental impacts that such an increased development level would have.

Radstock and Midsomer Norton, with their hills and valleys system, have areas with a good capacity for



capture of solar energy and we would like to see analysis of all the various options for locations in the Somer Valley area and their net impacts before any strategic decisions on District Heating are taken. We do not think that the policy to locate district Heating in Radstock, Midsomer Norton and Paulton can be considered to be sound at present.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

#### Plan Reference: Diagram 19: Distric Heating Priority Areas

**Reference:** 264\19

**Respondent:** Englishcombe Parish Council

**Representation (soundness):** The diagrams appear to extend the urban boundary of Bath southwards down the A367, showing a small "blister" around the site of the Combe Down Park & Ride. This area and the land around it and to the west of the A367 are within the Parishes of Combe Hay and Englishcombe and are in the Green Belt.

**Change sought to make sound:**

**Representation (legal compliance):** The diagrams appear to extend the urban boundary of Bath southwards down the A367, showing a small "blister" around the site of the Combe Down Park & Ride. This area and the land around it and to the west of the A367 are within the Parishes of Combe Hay and Englishcombe and are in the Green Belt.

**Change sought to make legally compliant:** This "blister" should be removed.

#### Plan Reference: Policy CP5: Flood Risk Management

**Reference:** 182\4

**Respondent:** Meadow View Residents Action Group

**Representation (soundness):**

**Change sought to make sound:**

**Representation (legal compliance):** The Failure to take adequate account of food risks is probably in breach of government directives on flood prevention and avoiding building on flood plains, yet in 2008 the Environmental Agency re-assessed the Somer Valley and doubled the estimated risk in some areas, which are still allocated for major development. (para. 4.23 page 86)

**Change sought to make legally compliant:**

**Reference:** 208\7 S

**Respondent:** Brian C Tanner

**Representation (soundness):** Both my wife and I are resident in Bath and North East Somerset and we are writing to register out joint support for the revised Draft Core Strategy which is currently under dicussion.

This is Indeed an important document and the forward confirms that this will enable the Council to shape the physical change within the Bath and North East Somerset Council. The Draft Core Strategy provides the strategic policy to guide the change for the development and the use of the available land for the next 15 years until the year 2026

In particular I commend the Strategic Document for the following proposals:

7.0 The proposal of Flood Risk Management as noted in Policy CP5 is most important, more so in an ever changing pattern in the Climate.

I trust that these comments are helpful in your deliberations.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\45

**Respondent:** Bath Preservation Trust

**Representation (soundness):** The evidence on which the core strategy is based, in particular the 2010 SFR Management Strategy concludes that

‘there is no strategic solution reducing peak flow through Bath which is either technically or economically viable. As such the Strategy proposes the provision of compensatory storage upstream combined with on-site flood defences. New development must provide storage to offset the volume of water that would be displaced in a flood event by the defences on-site. In order to meet this requirement maximum flood storage area of 345,000m<sup>3</sup> volume would be required as this is equivalent to the total combined volume of the footprint of the identified development sites. Provision of compensatory storage off-site is more cost-effective than providing it on-site and allows for greater flexibility in master planning sites.’

This is paraphrased in 2.47 and 2.48 of the Core Strategy. However the Atkins Report also concludes that the delivery of upstream storage should take place within the first 5 years of the Core Strategy in order to make the riverside sites viable, and suggests that this should be achieved through the partnership of the Council with Central funding rather than assuming that site developers will deliver any more than site specific flood defences.

The delivery of such upstream storage as described in paragraph 2.48 potentially relies on collaboration with landowners and the local authority in Wiltshire, but these are not referred to by name. Sites, if identified in the SFRMA study, are not included in the publicly available evidence base, From an external view point the only locations within B&NES for potential upstream flood storage might be Lambridge and Bathampton Meadows, yet the latter has controversially been identified as a potential Park and Ride site which may in turn create a need for flood compensation.

There is a potential mismatch between the flood needs described in Para 2.47-8 and the language relating to re-animation of the river frontage in paragraph 2.49 and elsewhere.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\46

**Respondent:** Bath Preservation Trust

**Representation (soundness):** With regard to the Flood Risk Management Policy, CP5, this is far weaker than the external evidence suggests it needs to be. The policy reads as if piecemeal (developer-funded) flood defences site by site will be sufficient to meet the risk, whereas the Atkins Report is quite clear that upstream storage will be needed and should be done in the first 5 years of the strategy.

Delivery of policy CP5 is described as being achieved through the development management process, which in the absence of more specific policies is unlikely to be able to do so. Flood management issues resulted in late changes to Western Riverside Phase 1 and significant, potentially fatal, problems with the ‘Dyson’ scheme, late in the day when considerable expense had already been undertaken).

Its implementation indicator (P134) is ‘the number of planning permissions granted contrary to Environment Agency advice’ rather than (for example) ‘cubic metres of upstream storage provided.’

There is no mention in CP5 of implementation policies for the management of increased storm water due to climate change.

- Change sought to make sound:**
- CP5 to make explicit reference to need for delivery of upstream storage
  - Sites for upstream storage identified
  - Delivery strategy for upstream storage in first 5 years of plan identified
  - Upstream collaboration with Wiltshire delineated and identified by name.
  - Monitoring of CP5 to be 'cubic metres of upstream storage provided.'
  - Implementation policies for the management of increased storm water runoff due to climate change, and implications for ageing infrastructure to be taken into account.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 227\10

**Respondent:** London Road Area Residents Association

**Representation (soundness):** Para 1 of Policy CP5 (page 113) is weak and needs beefing up. Viz "Any development in areas at risk of flooding will be expected"..."which may take" "as may be necessary".

Para 3 bases the Policy on the Flood Risk Management Strategy which effectively states that the only financially viable strategy is of Compensatory Flood works upstream – 345,000 cubic metres in volume Maximum (or minimum?). This is to match the displaced volume/s of water (+20% for climate change) caused by further developments in Bath but remember please that Bath came within 2 inches of flooding in October 2000 since which time Prof Chris Baines – advisor to B&NES has suggested a one million Cumec upstream reservoir.

The FRMS is also full of uncertainties in its wording and the section on "Risks to successful delivery" (p68) demand that the wording of CP5 be strengthened.

**Change sought to make sound:** The wording of CP5 Flood Risk Management (page113) should state categorically that :-

"No development will be allowed unless measures to offset flood risk are in place and functional BEFORE development commences".

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 245\7 S

**Respondent:** Environment Agency

**Representation (soundness):** We are pleased to see the inclusion of a flood risk management core policy. This will ensure that national legislation is adequately applied while taking into account the local flood risk issues across the district, as indicated in the Strategic Flood Risk Assessments and Flood Risk Management Strategy that have been prepared by BANES. We believe a Core Policy on flood risk, referring to these studies, is important to ensure the studies recommendations are implemented in future LDF documents and when development proposals comes forward.

It is important that the supporting text has highlighted explicitly the need to take a sequential approach within the broad locations specified for new development by the policy areas. This is crucial given that many of the policy areas indicate mixed use developments which may have very different levels of vulnerability to flood risk. Also for certain parts of the policy areas development may be completely inappropriate due it being considered to be functional floodplain (Flood Zone 3b) now or in the future.

**Change sought to make sound:** N/A

**Representation (legal compliance):**

**Reference:** 262\1

**Respondent:** Woodland Trust

**Representation (soundness):** Whilst we are pleased to see this Policy CP5 included in the Draft Core Strategy, it would be further improved if this policy and para 6.29 contained specific mention of the role of woodland in flood risk management.

The Woodland Trust believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication Woodland actions for biodiversity and their role in water management (pdf) - <http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx>.

Trees and woodland are very well placed to contribute to the emerging agenda of water risk management in the light of a changing climate. For example: -

- Creation of tree and woodland buffers to improve water quality
- Buffers adjacent to surface waters, pollution sources or pollution pathways can improve water quality by reducing sediment, nitrate, phosphate and pesticide concentrations.
- Trees on river banks can help reduce water temperature, thus helping to maintain oxygen levels.

Native woodland creation to improve water quality

- Native woodland creation on arable, improved pasture and urban areas can improve water quality by reducing sediment, nitrate, phosphate and pesticide concentrations.
- Native woodland creation as part of Sustainable urban drainage systems (SUDs) can reduce surface run-off and retain pollutants on brownfield sites.

Restoration of Planted Ancient Woodland Sites (PAWS) in upland headwaters to increase water quality and quantity

- Restoration of PAWS (ancient woodland sites planted with non-native conifers) to broadleaf woodland or other semi-natural habitats can reduce nitrate concentrations by up to 90 per cent and increase local water quantity by 20-50 per cent in very dry regions.
- Restoration can also reduce local streamwater acidification in acid-sensitive areas.

Creation/Restoration of floodplain woodland to alleviate, and slow the rate of, flooding

- The creation or restoration of native broadleaf woodland can lead to a reduction of major and local flood events. Modelling suggests that major flood events can be delayed and attenuated where woodland creation is targeted to bottlenecks in 100-year flood envelopes.
- At the local scale woodland creation also needs to be appropriately targeted. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6 %.
- The creation of short rotation coppice woodland can lead to a reduction in major and local flood events.

National Policy

Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The Forestry Commission's publication, The Case for Trees in development and the urban environment (Forestry Commission, July 2010), explains how: 'the capacity of trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of Sustainable Urban Drainage Systems'.

The 2007 Pitt Review (Learning the lessons from the 2007 floods, Cabinet Office 2008) highlighted the dangers of surface water flooding and recommended giving Local Authorities new responsibilities for flood risk management and development of surface water management plans, now formalised by the Flood Risk Regulations 2009 and the Floods & Water Management Act 2010.

The Commission for Rural Communities report on England's Upland areas (High ground, high potential – a future for England's upland communities, June 2010) recommends that : 'Defra and its agencies should use good practice (such as SCaMP and catchment sensitive farming) to develop models for public-private investment that secures multiple objectives in upland catchments, maintains water quality, reduces flood risk and potentially provides income for hill farmers and land managers'.

The Agriculture Minister Jim Paice stated in Parliament that 'trees have a vital role in flood prevention and alleviation' (Answer to Parliamentary Question, 4/11/2010).

#### Sub national policy

- The South West Framework Implementation Plan 2009-2012 (Forestry Commission, 2009) contains two key actions – "2.4: Undertake pilot projects using new planting or woodland management to manage river flows and contribute to Water Framework Directive objectives" and "2.5: Develop projects to demonstrate and monitor benefits of riparian planting in reducing river temperatures".

#### Delivery

- For instance Wessex Water and FWAG are running a tree planting project in Somerset to help solve flooding issues - <http://www.wessexwater.co.uk/news/threecol.aspx?id=6056>.
- Similarly, United Utilities are pioneering woodland creation in their Bassenthwaite Lake Restoration Programme in the Lake District to help provide future flood protection - [http://www.lakedistrict.gov.uk/gtga\\_np\\_news-article.htm?newsid=15131](http://www.lakedistrict.gov.uk/gtga_np_news-article.htm?newsid=15131).
- In Milton Keynes, the city's Parks Trust has developed an area of floodplain forest to improve both water and landscape quality, but also to manage the risk of flooding – <http://www.cabe.org.uk/case-studies/floodplain-forest>.
- The National Trust is running a project at their Holnicote Estate in Somerset, supported by Defra and EA, aiming to show how land management can be used to alleviate flood risk and to deliver wider benefits, including improved biodiversity and water quality, carbon stewardship, public access and landscape quality. Work includes new woodland creation - [http://www.jbaconsulting.co.uk/Holnicote\\_Estate](http://www.jbaconsulting.co.uk/Holnicote_Estate).
- Woodland creation at Pontbren in Wales showed that within 2-6 years of trees being planted, water infiltrated into the soil at a rate 60 times greater than on neighbouring grassland - <http://www.forestresearch.gov.uk/website/searchall.nsf/GoogleResultsFR?open=&cx=001774383426470524382:up0y5skrqss&cof=FORID:10&ie=UTF-8&q=pontbren%20case%20study>.

**Change sought to make sound:** The Woodland Trust believes that the full value and potential of trees and woods to help mitigate flooding should be recognised and properly funded at all levels of policy and delivery. We would like to see the wording highlighted in italics above incorporated into Policy CP5 and paragraph 6.29.

We would also like to see :

- Greater recognition that natural processes and in particular trees and woodland, should play a role Catchment Flood Management plans, alongside any measures for increased engineering solutions.
- The full value of trees in urban areas recognised in the development by local authorities in flood risk assessments
- Urban tree cover playing a central role in SUDS. Clear responsibility for ownership and maintenance of SUDS
- The role of native trees and woods fully recognised in the development of Local Surface Water Management plans by local authorities.
- Community led action to plant native trees and woods in gardens, streets and community spaces.
- Increased levels of funding for native woodland creation which recognises the benefits of woodland for flood alleviation, and in a range of other ecosystem services, including improving water quality and reducing risk of soil erosion.

#### Representation (legal compliance):

#### Change sought to make legally compliant:

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**Reference:** 263\4

**Respondent:** Wessex Water

**Representation** We note and support the policies which are pertinent to our responsibilities: Policies CP2 sustainable (soundness): construction; CP5 Flood Risk Management; and CP13 Infrastructure Provision.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\19

**Respondent:** The Bath Society

**Representation** Responding to climate change [Policies CP1 – CP5]

**(soundness):** These responses appear sensible and pragmatic, using the most up to date data and approach. There are however significant limitations to what the local authority can either achieve or request. CP3 Renewable Energy including proposals for district heating [ CP4 ], is laudable though very ambitious. The Authority's 'enhanced role' in terms of flood risk management [ CP5 Flood Risk Management] has been prescribed for it by new statute ( Flood & Water Management Act 2010) and it is to be hoped that it will have the resources to meet these extra responsibilities. We regard the 'Flood Risk Management Strategy' , especially as it affects the centre of Bath, as being of critical importance. See our detailed representations on this topic.

**Change sought to make sound:**

**Representation (legal compliance):**

The Local Authority's enhanced role in terms of flood risk management has been prescribed for it by new statute ( Flood & Water Management Act 2010) and it is to be hoped that it will have the resources to meet these extra responsibilities.

We regard the 'Flood Risk Management Strategy' ,especially as it affects the centre of Bath, as being of critical importance.

**Change sought to make legally compliant:**

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**Reference:** 276\5

**Respondent:** Hignett Family Trust

**Representation** The CS preparation has involved the carrying out of a Strategic Flood Risk Assessment 1 & 2 which

**(soundness):** confirms that significant parts of the District lie within areas at risk of flooding, especially within the River Avon Catchment as it passes through Bath. This risk is heightened by future climate change, which will lead to more extreme flood events as witnessed in the UK over the last 5 years.

The risk is further increased where more vulnerable development, such as residential development , is located in areas at risk of flooding , now or in the future. Not surprisingly this has lead to the development of national policy to encourage local authorities to locate new development in sustainable locations , at least risk of flooding, taking into account vulnerability to flooding. This policy position is universally understood and it is repeated in the text at 6.26 and in Policy CP5 where it states ...'avoiding inappropriate development in areas at high risk of flooding and directing development away from areas at highest risk, in line with Government Policy (PPS25).

In that context and having regard to all the evidence provided by the Council in the SFRA's and the Flood Risk Management Strategy, it must call into question the soundness of a strategy that seeks to locate upto 3500 new homes and 100,000m<sup>2</sup> of office development within a river corridor with a long history pf flooding problems and located predominantly in Zone 2 and Zone 3a flood plain. In addition, the development of the strategy on a piecemeal basis is not sound, as it has not been demonstrated that both protection works and flood storage capacity can be delivered on sites in the river corridor to the satisfaction of the EA.

The locating of development within Flood Plain will impact on flood storage capacity and flood pathways ,as mapped in the SFRA. This in turn will risk further property , residential or commercial , that would otherwise not suffer flooding. In a City as densely developed as Bath , this means that

managing flood risk and protection of existing property is finely balanced.

Both the Interim and the Final Sequential Test Report make clear that there are no other areas which are available at Bath that are at lower risk of flooding and are available and capable of accommodating development. This is plainly wrong and consequently calls into question the soundness of the CS where a key strategic policy is predicated on this basis. This element of the strategy was brought to the attention of the Council in the CSSO Reps 2009, where the New Neighbourhood at Odd Down was confirmed as being in Zone 1 Flood Plain. The best location in terms of flood risk.

Flood Risk Management Strategy 2010 concludes that the flooding risk arising from the River Avon through the City of Bath is significant. The river flows at time of flood will be extreme, more than 450 m<sup>3</sup>/sec. , which means that flood storage/mitigation works upstream will not reduce flood water levels to any significant degree to reduce flooding. Nevertheless the Report concludes that such upstream flood storage capacity will be required to accommodate development proposed in the CS due to loss of flood storage. This has been calculated to be approx. 350,000m<sup>3</sup> of flood storage capacity that will be required by way of compensation. The CS provides no evidence to demonstrate that this is achievable or deliverable in the timescale contemplated by the policies of the CS or at all. This means the CS is unsound.

The evidence in the SFRA, the Sequential Test and the Flood Risk Management Strategy will show that the Policy B1 is unsound on flood risk management grounds. The Council will need to show how the plan can be made sound and deliver the amount and type of development given the flood risk. An alternative of site in Zone 1 is available and deliverable without any risk of flooding or major upstream compensation works. This site at Odd Down will complement the sites in the river corridor whose delivery will be uncertain and of a use less vulnerable to flooding events.

Policy CP5 will need to be substantially amended to reflect the challenges facing the development industry and the residents of Bath as they try to strategically plan for flood risk.

**Change sought to make sound:** Amend the text and the policy wording to reflect the challenges that exist to address flood risk, esp. at Bath.

Details of how flood storage compensation will be delivered to secure the strategic policies in the CS will need to be shown to be sound and within policy CP5.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 292\14

**Respondent:** Bath Avon River Corridor Group

**Representation** Policy CP5 p113 Insufficient identification of the role undeveloped areas along the river corridor will

**(soundness):** need to play in flood management and the future patterns of economic life that can flow from them on an agricultural rather than only engineering approach.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 297\14

**Respondent:** Bath Rugby Club

**Representation** P8ge 113, Policy CPS

**(soundness):** The requirements In Policy CPS for sustainable drainage systems should not be a blanket requirement for all developments. Individual site circumstances may mean that such systems are not appropriate for particular developments.

In order to ensure that the Core Strategy accords with the principles of being effective, flexibility should be Incorporated Into this policy through the introduction of ' where possible" after "management " In

the second line.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 298\13

**Respondent:** Liberal Democrat Group

**Representation  
(soundness):** Policy CP5, second paragraph

**Change sought to** “All development will be expected to incorporate sustainable drainage systems to maximise  
**make sound:** absorbency, reduce surface water run-off and minimise its contribution to flood risks elsewhere”.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 314\1

**Respondent:** Helen Woodley

**Representation** I think the Draft Core Strategy is not sound because not effective in tackling the effects of climate  
**(soundness):** change because it does not include a policy on Drought Risk Management.

It is strange that there has been no Drought Risk Management scoping study. The prediction for hotter drier summers may well impact on food production. There is also potential for dual benefit from the provision of upland/upstream storage reservoirs, by also reducing flood risk.

My comment 2977 relates.

**Change sought to** Suggested Wording

**make sound:** A Drought Risk Management strategy will be developed and be subject to public consultation.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 314\5

**Respondent:** Helen Woodley

**Representation** I think the Draft Core Strategy is not sound because not effective in helping to tackle the effects of  
**(soundness):** climate change without a strategic district-wide policy on Flood Prevention.

The scoping study for flood risk management is very helpful for decisions relating to built development in defined critical areas, and the July 2010 Strategy focuses on reducing peak flood flow through Bath. These are of course of huge importance. The Flood Risk Management Policy (CP5) has been based on very detailed evidence and can be supported.

However, because of the way the evidence base has been focused, policy is under-developed in relation to agriculture and the rural areas, and also in the ways we need to relate and work more closely with our upstream and downstream neighbours in land-use planning. Risks and benefits to local agricultural production have not been identified. The fact that our county contains only the middle section of the River Avon has not been brought to the fore. In fact it was declared in the scoping study that our neighbours provide an additional obstacle, and options beyond our boundary were adversely weighted. That barrier should be removed, as it appears to have thwarted any detailed research on the scope of high-level storage in farmland and woodland: not solely reservoirs but large-scale upland swales, contour channels and soil management too.

My comment 2977 relates.

**Change sought to** Suggested Wording:

**make sound:** A Strategic Flood Prevention strategy will be developed, to include an assessment of the potential to



reduce peak flood flows, particularly through Bath, through rural land use changes and improvements. It will closely involve neighbouring authorities in the Avon catchment area and be subject to public consultation.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 6.36**

**Reference:** 297\15

**Respondent:** Bath Rugby Club

**Representation** Page 114, Paragraph 6.36

**(soundness):**

We support the objectives of paragraph 6.36, which states that the Council will support contemporary and innovative responses to local distinctiveness. However it would be useful if this were included in Policy CP6.

Page 114 para 6.36 We support the objectives of para 6.36 which states that the Council will support contemporary and innovative responses to local distinctiveness. However, it would be useful if this were included in policy CP6.

**Change sought to make sound:** The text from para 6.36 which states that the Council will support contemporary and innovative responses to local distinctiveness should be incorporated into Policy CP6.

Include confirmation in Policy CP6 that to preserve or enhance the historic environment does not mean that change through redevelopment, use, appearance etc is in itself unacceptable

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Policy CP6: Environmental Quality**

**Reference:** 118\6 S

**Respondent:** Mrs J. Tinworth

**Representation** Importance in view of possible climate change to protect wildlife habitats

**(soundness):**

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 147\13

**Respondent:** Bath Green Party

**Representation** DW23: Does the proposed core policy for landscape include all the necessary elements?

**(soundness):** As well as country lanes, the list of our sensitive landscapes should also include all public rights of way, which should be protected.

DW24: Does the proposed core policy for historic environment include all the necessary elements? The historic environment should only ever be compromised in efforts to build sustainability (as defined by our response), e.g. in preventing further climate change, not to build car parks. Protecting our future is more important than protecting our past.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 182\5

**Respondent:** Meadow View Residents Action Group

**Representation  
(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):** We also question whether sufficient notice has been taken of the European Habitat Directive, which was ruled to have been breached in the case of the NRR development on the former GWR railway lands in Radstock.

**Change sought to make legally compliant:**

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**Reference:** 208\5 S

**Respondent:** Brian C Tanner

**Representation  
(soundness):** Both my wife and I are resident in Bath and North East Somerset and we are writing to register out joint support for the revised Draft Core Strategy which is currently under discussion.

This is Indeed an important document and the forward confirms that this will enable the Council to shape the physical change within the Bath and North East Somerset Council. The Draft Core Strategy provides the strategic policy to guide the change for the development and the use of the available land for the next 15 years until the year 2026

In particular I commend the Strategic Document for the following proposals:  
5.0 The commitment to the environment and also to protect local wildlife and their habitats.

I trust that these comments are helpful in your deliberations.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 222\13

**Respondent:** Duchy of Cornwall

**Representation  
(soundness):** The Duchy is broadly supportive of this policy. As a point of clarity, the Core Strategy refers to achieving a Good standard for CABE's Building for Life, while CABE set standards of Silver or Gold. The use of Good provides an opportunity for confusion, and stating Silver standard as a minimum (or Gold if that is required) would be more appropriate.

CP6 section 4 on nature conservation, the use of 'valued habitats' does not appear to be defined and is therefore open to interpretation.

The Duchy of Cornwall fully supports the inclusion of the Nature Conservation element of Policy CP6. The policy seeks to ensure that "New Development will, in particular, respect and enhance existing networks of priority habitat; facilitate migration and dispersal through the natural and built environment; and seek to reduce fragmentation of existing habitats".

As noted elsewhere, urban extensions have the potential to design in coherent and appropriate green infrastructure/habitat creation that would link habitats within the site and exterior to it. We would therefore highlight the potential for an urban extension to the west of Twerton to deliver the aims of this policy. This should be especially

considered when combined with associated biodiversity friendly changes, associated with an urban extension here, to management of Duchy owned hinterland in the form of revision from intensive arable to organic pasture and similar. Further, unlike other potential urban extensions and development on the urban edge of Bath, the site is not constrained by possible impacts to designated sites (particularly European sites designated for their bat interest) or priority habitats. Therefore, we believe that an urban extension to the west of Twerton would deliver substantial biodiversity gain in line with the aims of Policy CP6.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\47

**Respondent:** Bath Preservation Trust

**Representation** We welcome the emphasis on quality design, and the need for contextualisation and consultation with **(soundness):** communities and amenity groups. We think that the Council should work in partnership with such groups to produce guiding principles for such design. In Bath itself, understanding the context is paramount as is choice of materials, form, height, and respect for the Outstanding Universal Value of the World Heritage Site which should be the first principle to which any design concept adheres.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\48

**Respondent:** Bath Preservation Trust

**Representation** In relation to High Quality Design, the wording of the policy is extremely general and the commentary **(soundness):** on delivery gives little confidence that the generalities will be enforceable. B&NES' commitment to 'comprehensive integration of its strategies and programmes, partnership working and effective community involvement' will not necessarily deliver high quality design. The CS should commit B&NES to developing specific principles for achieving high quality design, particularly in the World Heritage Site. BPT has developed its own recommendations for good design in Bath (attached) which we commend to the Council as a useful starting point for a usable policy tool in this difficult area.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\49

**Respondent:** Bath Preservation Trust

**Representation** Section 6C (pP114 and Policy CP6 ) should lead with the historic environment. Especially in Bath itself, **(soundness):** there is no point in talking about high quality design without contextualising it.

**Change sought to make sound:** •Re-order policy CP6 to place historic environment above high quality design.

**make sound:** •Insert new sub-point in (1) in Policy CP6 – detailed understanding of the Outstanding Universal Value of Bath World Heritage Site'

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\50

**Respondent:** Bath Preservation Trust

**Representation** In relation to the Historic Environment, the second sentence simply restates national policy and is  
**(soundness):** therefore redundant. The first sentence is again very general and fails to give any real indication of the kind of protection that will be expected. This section needs to be expanded to achieve a similar level of detail to paragraph 4 of 6c (Nature Conservation)

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\51

**Respondent:** Bath Preservation Trust

**Representation** 6.42 refers to national policies in PPS5 together with saved policies in the Local Plan. However, Annex C  
**(soundness):** to the old PPG 15 provided detailed guidance which often formed the basis of defensible decision making by the LPA; the absence of this level of detail in either PPS 5 or local policy means that there is potentially a policy vacuum resulting in inconsistent decision making.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\52

**Respondent:** Bath Preservation Trust

**Representation** 6.43 refers to keeping Conservation Areas under review. The Conservation Area appraisal for the Bath  
**(soundness):** Conservation Area is not compliant and is significantly under-developed compared with conservation area appraisals in some of B&NES's surrounding villages, despite the fact that Bath is a WHS and effectively the whole City should enjoy conservation area standard protection under article 1(5), if necessary reinforced by Article 4 directions.

**Change sought to make sound:** Commit to the production of a new Bath Conservation Area appraisal, taking on board the items previously included in Annex C of PPG15 together with current best practice guidance from English Heritage

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\53

**Respondent:** Bath Preservation Trust

**Representation** The Development Management process is identified as the principal means of delivering environmental  
**(soundness):** quality. This will only be achieved if the CS is supported by planning policies and guidance which give clarity to developers about what is meant by good design and reduce the scope for inconsistent decisions by officers and the Development Control Committee.

**Change sought to make sound:** •Strengthen the role of prescriptive site specific SPDs in the place-making plan, to be drawn up prior to development.  
•Include WHS Management Plan as SPD in delivery section  
•Include Building Heights Strategy as SPD in delivery section

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\54

**Respondent:** Bath Preservation Trust

**Representation  
(soundness):**

**Change sought to make sound:** Paragraph 1 and the associated commentary on delivery should provide a peg on which to hang supplementary planning guidance on what constitutes good design in the specific context of the City of Bath World Heritage Site (and similarly in other parts of B&NES).

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\55

**Respondent:** Bath Preservation Trust

**Representation  
(soundness):**

**Change sought to make sound:** Paragraph 2 should set out the two or three key aspects of protection of the historic environment (cf points a to d of paragraph 4), for example by referring to the encouragement of sensitive adaptation and reuse of historic buildings, the need to pay particular attention to building heights and view management, and the need to reduce the pressure on historic assets by reducing vehicle movements in sensitive areas. The second sentence of paragraph 2 needs to be deleted for the reasons set out in our comments on Policy B4.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 235\2 S

**Respondent:** Mendip Hills AONB Unit

**Representation (soundness):** The AONB Unit fully supports the inclusion of Policy CP6 in the draft Core Strategy which should help to contribute towards achieving objectives in the Mendip Hills AONB Management Plan relating to landscape and biodiversity.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 245\8 S

**Respondent:** Environment Agency

**Representation (soundness):** We are pleased to see that a strong policy in relation to nature conservation has been included, that not only protects existing habitats but also seeks enhancement, habitat creation and improving wildlife networks. We support the inclusion of text that addresses the issue of allowing access to habitat that does not compromise its integrity.

In terms of delivery of nature conservation the wording regarding delivery would benefit from cross-reference to the Green Infrastructure Strategy which will have an important role in influencing BANES's Placemaking Plan to deliver nature conservation goals.

**Change sought to make sound:** N/A

**Representation (legal compliance):**

**Change sought to make legally compliant:** N/A

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**Reference:** 246\5 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.

27.The Historic Environment.  
Page 116 paragraph 6.39

28.Conservation Areas.  
Page 116 paragraph 6.43

29.Landscape.  
Page 116 paragraphs 6.44 to 6.47

30.Nature Conservation.  
Page 116 paragraphs 6.48 to 6.51, 6.53 and 6.54  
Page 117 Policy CP6

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 252\11

**Respondent:** Cadbury Kraft Foods

**Representation** Whilst the above policy does not apply to the site, flexibility should be provided within any emerging  
**(soundness):** 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.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 262\3

**Respondent:** Woodland Trust

**Representation** In relation to the Nature conservation section of Policy CP6, whilst we are pleased to see the wording '  
**(soundness):** The quality, extent & robustness of protected sites and valued habitats will be enhanced, and networks of valued habitat will be restored or created', it does not provide the absolute protection that irreplaceable semi-natural habitats like ancient woodland and ancient trees require. We also raised this in response to the Core Strategy Spatial Options consultation.

Ancient woodland (land that has been continually wooded since at least AD1600) is our richest habitat for wildlife being home to more species of conservation concern than any other habitat (supporting some 232 species as outlined in the UK Biodiversity Action Plan, 1994, almost twice as many species of conservation concern as any other habitat e.g. more than twice as many as chalk grassland and almost three times as many as lowland heathland. Ancient woods form a unique link to the primeval wildwood habitat that covered most of lowland Britain following the last Ice Age.

Ancient woods are uniquely valuable. Their wildlife communities are generally richer than those of recent woods, having developed over long periods of time. They contain a high proportion of rare and vulnerable species, many of which require the stable conditions that ancient woodland affords. As the terrestrial habitat most representative of original, natural, stable conditions, ancient woodland is home to more threatened species than any other habitat in the UK.

With only 2.4% of the land area in Great Britain and 1.86% in BANES covered by ancient woodland, we cannot afford any more of this finite resource to be lost forever. It is therefore essential that this habitat be protected from development.

Protection for Ancient & Veteran Trees – many ancient trees are not formally recorded, and the Woodland Trust and Ancient Tree Forum are running a national project to identify and map ancient trees (<http://www.ancienttreehunt.org.uk/>) so they can be protected and enhanced for the benefit of all. This project has already recorded a number of ancient trees throughout the BANES area.

Ancient woods and trees are also treasure troves of historical features such as bronze and iron age earthworks, Saxon range boundaries, ancient park boundaries, ridge and furrow, park pales and woodbanks, all of which give a picture of past land use. Old coppice stools and pollards point to past woodland management practices, and charcoal pits, ore furnaces and kilns are clues to local industrial history. Finally, ancient woods are timeless places of great beauty and tranquillity. The importance of woodland, and especially ancient woodland, to our quality of life should not be underestimated.

#### Central Government policy

- Woodland has the ability to contribute to 10 of the 20 of the UK Framework Indicators of sustainable development launched in March 2005 (HM Government, 2005, One future - different paths. The UK's shared framework for sustainable development, p12). Including contributing to biodiversity, reducing air pollution, improving health, education, employment, environmental equality, wellbeing and helping the economy grow.
- The 'UK Forestry Standard' sets out the UK Government's approach to sustainable forestry. It states: "ancient semi-natural woods...are of special value." The Standard has a series of UK-wide aims for semi-natural woodland and clearly states: "the area occupied by semi-natural woodland should not be reduced." (Forestry Authority, 1998, UK Forestry Standard: Standard Note 5, pp.41-43)
- The biodiversity strategy for England clearly states that the Government will "take measures to prevent loss or damage to ancient woodland and trees, and their uniquely rich biodiversity, from development." (DEFRA, 2002, Working with the grain of nature. A biodiversity strategy for England , para 6.9).
- Planning Policy Statement 9 on Biodiversity and Geological Conservation clearly states: "Ancient woodland is a valuable biodiversity resource both for the diversity of species and for its longevity as woodland. Once lost it cannot be recreated. Local planning authorities should identify any areas of ancient woodland in their areas that do not have statutory protection (e.g. as an SSSI). They should not grant planning permission for any developments that would result in its loss or deterioration...Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Planning authorities should encourage the conservation of such trees as part of development proposals." (ODPM, PPS9, 2005, paragraph 10)
- Under section 74 of the Countryside and Rights of Way Act 2000, the Government has a statutory duty to publish lists of priority conservation habitats. Under section 40 of the Natural Environment and Rural Communities Act 2006, all public authorities now have a statutory duty to conserve biodiversity. The UK BAP targets includes a Habitat Action Plan for Native Woodland which specifies a clear 'maintenance' target of no more loss of ancient woodland. It is therefore axiomatic that BANES has a statutory obligation to protect ancient woodland.
- Consultation paper on a new Planning Policy Statement: Planning for a Natural and Healthy Environment(2010): 'NE8.4 Planning permission should be refused for development that would result in the loss or deterioration of species and habitats of principal importance, ancient woodland or aged or 'veteran' trees found outside ancient woodland, unless the need for, and benefits of, the development in that location outweigh their loss. Local planning authorities should consider the retention of veteran trees and other trees of amenity value as part of development proposals, and where appropriate, use tree preservation orders to protect them in the longer term'.
- The Coalition Government has signalled its intention protect biodiversity – 'We will introduce measures to protect wildlife and promote green spaces and wildlife corridors in order to halt the loss of habitats and restore biodiversity' ('The Coalition – Our programme for government', May 2010).

#### Sub-national policy

The SW Forestry Framework (Forestry Commission, 2005) contains a key objective to 'Protect, improve and manage Ancient Semi-Natural Woodland...'

As an example of policy used by other local authorities, the Sheffield City Policies and Sites Consultation draft (<http://www.sheffield.gov.uk/planning-and-city-development/planning-documents/sdf/city-policies-and-sites>) states in Policy G3: 'New developments will be required to include appropriate tree planting, to retain and integrate healthy, mature trees and hedgerows and replace any trees that need to be removed. Development will not be permitted that would directly or indirectly damage existing mature or ancient woodland, veteran trees or ancient or species-rich hedgerows'.

**Change sought to make sound:** We would like to see Policy CP6 provide absolute protection for ancient woodland and ancient trees, and for this to be backed up in a Trees & Woodlands Supplementary Planning Document (SPD).

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 264\9

**Respondent:** Englishcombe Parish Council

**Representation** This Parish strongly supports the concept, aims and objectives of the council's policy and statements on **(soundness):** Conservation Areas; and the regular review of these areas as set out in the above Policy and Proposal 6.42.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\20 S

**Respondent:** The Bath Society

**Representation** We note and very much support the continued emphasis in such statutory planning documents on high **(soundness):** quality design , including the references to the historic environment and the importance of Bath's landscape setting.

We note and very much support the continued emphasis on high quality design , including the references to the historic environment, and the importance of Bath's landscape setting [ CP 6 Environmental Quality] .It is noted that a 'Green Infrastructure Strategy' is being prepared [ CP7 Green Infrastructure] and we support the emphasis being put on the 'river corridor through Bath' as a key green infrastructure(GI) asset. However, does the Authority have the resources and expertise to protect this corridor ? We are aware that GI Strategies are emerging in many parts of the UK now and hope that lessons and 'best practice' examples will be drawn from these. We note that the Green Belt [ Policy CP8 ] is seen to play 'a vital role in maintaining the setting of the World Heritage Site of Bath' ( para 6.61), a position which we very much support.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 274\3

**Respondent:** Sport England

**Representation** 4. COMMENT – Active Design

**(soundness):** Sport England believes that being active should be an intrinsic part of everyone's life pattern. The master planning of new housing proposal has a vital role in providing easy access to a choice of opportunities for sport and physical activity to suit all age groups for making new communities more active and healthy.

Sport England commissioned David Lock & Associates to investigate the contribution that masterplanning can make to create new environments that maximise opportunities for participation in



sport and physical activity. This work including a developer's checklist has been completed and can be accessed via [www.sportengland.org](http://www.sportengland.org).

Through an analysis of the current health agenda and urban design principles and good practice, the term ACTIVE DESIGN has been adopted to describe ways in which master planning can promote healthy environments through creating healthy environments through creating conditions for participation in sport and physical activity and the use of active travel modes (walking and cycling). Three overlapping Active Design objectives have been identified that should be promoted by master plans: improving accessibility; enhancing amenity and increasing awareness.

Sport England would encourage the developers to design future proposals in BaNES in line with the Active Design principles.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 278\6

**Respondent:** Cotswolds Conservation Board

**Representation (soundness):** The Cotswolds Conservation Board supports the policy for "Environmental Quality" as set out in Policy CP6.

**Change sought to make sound:**

**Representation (legal compliance):** The Cotswolds Conservation Board supports the policy for "Environmental Quality" as set out in Policy CP6.

**Change sought to make legally compliant:**

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**Reference:** 279\6

**Respondent:** English Heritage

**Representation (soundness):** Heritage management

**(soundness):** Policy CP6 refers to preserving or enhancing the historic environment. In our experience it has proved extremely difficult for Core Strategies to avoid repeating national policy to some extent and with the uncertainty surrounding the form of a new national planning framework we would suggest policy CP6 reads will be preserved and where appropriate enhanced.

A positive and proactive strategy for the historic environment

The Local Development Framework should establish a proactive conservation response to the relative condition of the heritage assets in the district (PPS5, policy HE3). What is the Core Strategy's intended approach to addressing the conservation areas, listed buildings and scheduled monuments (e.g. the Wansdyke) under threat as highlighted in the evidence base (heritage@risk surveys)?

The section titled delivery associated with Policy CP6 refers to conservation appraisals, management plans, supplementary planning documents, guidance and other proactive strategies to support effective implementation. These initiatives are obviously welcomed although further clarification and detail will be required demonstrating what they will cover, when they will be prepared and by who? Are all conservation appraisals completed and up to date?

In addition English Heritage would encourage the preparation and adoption of a 'local list' of heritage assets in partnership with the local community; the identification of areas and/or sites of potential archaeological interest; and village design statements (refer to PPS5 and the associated practice guide).

Having regard to your evidence including heritage at risk surveys, you may also wish to

consider whether the exercise of permitted development rights undermines the aims for the historic environment. Might article 4 directions be advocated to ensure any development is given due consideration?

We note a commitment to the preparation of for example, a Green Infrastructure Strategy to be applied to secure contributions towards the upkeep of 'natural' assets and to undertake new initiatives across the District. English Heritage recommends the preparation of an equivalent heritage strategy to do likewise and conserve and enhance its 'historic' infrastructure. This could draw together the various heritage related initiatives to be undertaken, as above, and confirm how they will be applied.

Please note that the survey undertaken demonstrating Keynsham town centre conservation area 'at risk' was undertaken by BANES not English Heritage (para 3.19).

Will significant heritage assets be included on the proposals map?

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 281\7

**Respondent:** Natural England

**Representation** While we do not consider it necessary to return any completed representation forms there is one **(soundness):** further aspect of the Publication Version that we suggest could be improved and others we believe that are particularly worthy of praise. In hopes that this will be of interest to the authority we would, therefore, like to offer the following informal observations:

Policy CP6 – Environmental Quality  
(4) Nature Conservation

We welcome the broad wording and wide-ranging nature of this policy which reflects the high priority which the authority gives to nature conservation. In particular, we welcome the recognition of the contribution which can be made by new development to nature conservation and see this policy working well with strategic policies and with the forthcoming Placemaking DPD.

We have one comment on the supporting text to this policy at paragraph 6.49. Whilst we endorse the wording which has been used, this paragraph needs to make clear that, "proposed development will be required to assess potential impacts on protected sites and species and the adequacy of proposed mitigation measures."

Please do not hesitate to contact us if we can be of further assistance at this stage. We shall look forward to playing an active part in delivering aspects of the final Core Strategy and also contributing to the development of the further Bath & North East Somerset Development Framework documents. Thank you for your consideration.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 282\1

**Respondent:** Liberal Democrat Party

**Representation** I support the Core Strategy and the work done on this draft. It has listened to the concerns of the **(soundness):** public expressed during the first consultation process (Dec 2009 – Feb 2010). I fully agree with the proposal to have no urban extension particularly to the area to the South and West of Bath that would

have affected the residents of Newton St Loe because it would have coalesced their village with Twerton. Ref. 6.61 p120.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 297\16

**Respondent:** Bath Rugby Club

**Representation** Page 117, Policy CP6

**(soundness):** While we support the objectives of achieving high quality and Inclusive design, the text from Paragraph 6.36, which refers to the Council's support for contemporary and innovative responses to local distinctiveness has been omitted from Policy. This could lead to misinterpretation of the Policy.

The text from paragraph 6,36 which states that the Council will support contemporary and Innovative responses to local distinctiveness should be Incorporated Into Policy CP6. We consider the policy should also Include confirmation that to preserve or enhance the historic environment does not mean that change through redevelopment, use, appearance etc is in itself unacceptable.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 299\1 S

**Respondent:** Avon & Somerset Constabulary

**Representation** The first section of policy CP6 deals with high quality design, recognising that such can assist in the

**(soundness):** creation of safer places. This is also reflected in the pre-text to this policy at paragraph 6.35. The A&SC are pleased to note this recognition and fully support the principles of ensuring a safe environment through the use of design and will continue to work with the Local Planning Authority and other partners to ensure the objective of a safe environment is achieved. Secured by Design is the UK police flagship initiative supporting the principles of 'designing out crime' and it or its principles should be referred to in this pre-text. If this is not considered appropriate for the CS, the Constabulary would want to see additional information and policy within the development policies document (Placemaking Plan) to support and expand upon the principles of CP6.

As the Council is hopefully aware, the Constabulary employs a Crime Prevention Design Officer to assist developers in dealing with crime risk and offers advice for designing out crime in the built environment. In addition to physical security measures the officer will consider defensible space, access, crime and movement generators all of which can contribute to a reduction in crime and disorder. Again, such information should be cross referred to in any design policy.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 301\5

**Respondent:** South West RP Planning Consortium

**Representation** 6c Environmental Quality

**(soundness):** Policy CP6 Environmental quality

We note the new requirements for housing design to meet CABE's Building for Life 'Good' standard.

We welcome attempts to improve the standard of design of new developments in the District. However

we have two concerns. Firstly, the Housing Minister, Grant Shapps, has recently announced that he is not planning to implement the standards for affordable homes which the Homes and Community Agency were working on. Instead all new public and private homes will have to be built to the same standard. If these standards are devised and implemented locally, as we expect, then the Council may want to delay the introduction of this requirement and conduct a comprehensive review of all the standards it asks new housing to meet.

In addition, we question whether Building for Life should be a minimum requirement at all. All BANES Development Management planning officers are trained in implementing the principles of Building for Life and consultation comments from urban design officers already reflect this. On occasion it is simply not possible to meet certain Building for Life Standards and assessing the criteria can be very subjective. We therefore request that meeting the standard is only a guide, as is being proposed in the Bristol City Council Core Strategy following the Examination in Public.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 819\8

**Respondent:** Paulton Parish Council

**Representation** The hub of this policy sets out acceptable standards, and states, "the distinctive quality, character, and (soundness): diversity will be preserved, conserved, and enhanced". It continues, "that this will be achieved through high quality, and inclusive design, which contributes to the specific local context creating attractive, inspiring, and safe places"

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 821\14

**Respondent:** Cam Valley Wildlife Group

**Representation** Policy CP6 includes reference to what the Council requires of new development, "to respect and (soundness): enhance existing networks of priority habitat, facilitate migration and dispersal and seek to reduce fragmentation of existing habitats".

Whilst this policy is welcome, it will not prevent losses of important sites in a strategic context. It is recognised that biodiversity and habitat loss must be reversed, and that habitats and ecological networks must be restored and created. This involves far more than respecting existing networks of priority habitat, facilitating dispersal and reducing fragmentation. The nature of the priority habitat is not detailed. Some habitats do not fall into the general classifications, but can be very valuable nonetheless or valuable as part of a strategy; a degraded habitat could be the key to the creation or restoration of a functioning network and yet is neither a priority habitat nor part of an existing network; loss of a particular site may not fragment existing habitats because they are already fragmented, but may make the restoration of the fragmented habitats impossible; loss of a resource that could be used to build or restore something that provides an important function is not prevented by a directive that requires facilitation of migration and dispersal, as this can be done in various ways and for various groups without the potential for something much better entering into the decision-making process at all. This could be said to act against the Nature Conservation policy points directly above it in the Strategy.

We welcome the commitment to high quality and intelligent design and then need to ensure that green infrastructure permeates urban as well as rural areas. However, the focus for urban areas is on build quality that is concerned only peripherally with wildlife and biodiversity matters - developments that

wipe out high biodiversity value can still qualify for top marks on the only relevant criterion through provision of some (not adequate) mitigation or compensation. The need for growth in housing and employment as a key strategic issue cites a need to ensure that design standards protect the existing natural environment and presents the natural environment as of value through its attractiveness and for promoting liveability. We see growth as more than that. Wildlife and biodiversity conservation can provide employment, as can the production and sale of a range of features that can be incorporated into the new built environment. The marketing of places by using their wildlife features and nature reserves as part of the 'draw' can increase tourism and other businesses. We think that attractiveness to business and job creation should be added to the benefits of wildlife and biodiversity in the context of growth. Growth can be used as a driver to promote wildlife and biodiversity by stimulating that sector.

We are unclear on what 'respect' for networks and priority habitats actually entails. One reading of the conditions on new development in Policy CP6 is that a developer could develop a site that prevents the creation of a network in one area or removes a vital element of a network that supports metapopulations of important species, leading to its decline, whilst mitigating by contributing to a project in one of the Nature Areas! There is nothing in the text that precedes the policy that makes it clear that there will not continue to be business as usual, with developers being allowed to remove important biodiversity resources in change for dubious mitigation that fails to deliver.

In addition to the policies laid out in Policy CP6, the capacity for urban and other environments to support wildlife and biodiversity can be encouraged through respect for existing wildlife and biodiversity value and features, designing wildlife and biodiversity features into new developments, including attention to landscape features and planting, and through encouraging wildlife-friendly practices and the creation of habitats in gardens and public places. There is an opportunity here for the Council to be more innovative and to encourage local businesses to produce or install such a range of features in the knowledge that the Council will require a range of these relatively cheap (for developers) features as part of consent. The Council could encourage developers to source them locally, as local sourcing is part of the strategy for CO2 reduction. Examples include bat boxes, bug boxes, hedgehog shelters, 'bee walls', 'bee boxes' guidance leaflets for new home-owners for encouraging wildlife into the garden, plants for attracting wildlife, and so on.

There are many opportunities to enhance biodiversity and conserve important species and habitats in B&NES and we hope that the Council will be pro-active in its approach to biodiversity and wildlife conservation, including through making it clear that developers will have to pay much more attention to wildlife and biodiversity matters than the 'building for Life' standards. We note that the Council concludes that delivery of Policy CP6 will be through Development Management, through partnership initiatives, and through liaison with Natural England and ecology experts.

We are aware that resources for wildlife and biodiversity have been limited for some time and that the current national climate is not conducive to the large injections of funding that will be required for projects that are the result of partnership working and liaison. We do not expect there to be a significant change in funding for wildlife projects in B&NES and so take the view that the way that development is managed towards 2026 is going to be critical. However, there is more to the Council's function than development management - there is more that B&NES can do. It can identify opportunities for enhancing wildlife value and biodiversity throughout the workings of its various departments and put in place guidance to maximise the contribution that each department can make as part of its normal function, and thereby spread the cost of the Council's duties under the NERC Act and its commitment to the natural environment. We recommend that this is included in the Core Strategy as a delivery mechanism for Policy CP6.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

## Plan Reference: Paragraph 6.58

**Reference:** 152\6

**Respondent:** Corston Parish Council

**Representation** We understand that the Strategic Nature Area shown in diagram 20. Section 6.58 is about to be  
**(soundness):** extended from Kelston to Englishcombe on the South West side of Bath. This important change of designation should be reflected in the Core Strategy document.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

## Plan Reference: Policy CP7: Green Infrastructure

**Reference:** 23\1

**Respondent:** Avon Wildlife Trust

**Representation** The revised Core Policy 7 GI is now very good however the Trust feels that this policy or the document  
**(soundness):** as a whole is not yet consistent with Defra's Natural Environment Discussion document, October 2010. Defra's document will be used to shape national policy within the Natural Environment White Paper due to be released in spring this year. CP7 is not consistent or effective due to the lack of wording favouring not just protection of green infrastructure but enhancement of green infrastructure. It is ineffective in its ability to demonstrate targets for and other positive benefits of green infrastructure.

The Discussion Document states:

"The Coalition Programme for Government already sets out a range of commitments both to protect and to enhance the natural environment. (p2)

"We now have the opportunity to be the generation that finally puts a stop to the piecemeal degradation of our natural environment and, instead, seeks active opportunities to enhance its value. (p3)

"It will set out a programme of actions designed to put the value of the natural environment at the heart of Government and identify new ways of enabling local authorities and local communities to protect and enhance the natural environment. (p3)

"New jobs and opportunities can be created from activities which protect and enhance the natural environment." (p19) Defra's Natural Environment Discussion Document, October 2010.

**Change sought to** The policy should have frequent reference to 'enhancement' of green infrastructure (GI) (where  
**make sound:** applicable) as well as throughout the document in order to be consistent with national policy and increase the effectiveness of this core policy.

To further improve the effectiveness of this policy; 'the delivery of biodiversity restoration targets for B&NES Strategic Nature Areas (SNAs) in line with Biodiversity South West Nature Map' in terms of GI enhancement, should be included.

Following the recent release of Defra's Payments for ecosystem services, 2010 we suggest an update in the language used referring to the benefits of biodiversity and GI. Payments for ecosystem services (PES) highlights the value of the natural environment and the diverse range of benefits that it delivers including food, clean water, healthy soil and carbon storage, recreational opportunities, valued landscapes and the recycling of nutrients. The policy should acknowledge the possibilities and variety of benefits that will arise from enhancing GI with reference to the PES document and Defra's Natural Environment Discussion Document, October 2010.

For example, 'Payments for ecosystem services (PES) can be employed as a strategy for providing a well designed managed network of GI. PES provides the opportunity to link up beneficiaries and providers

as well as engaging in a broad spectrum of stakeholders which can deliver improved outcomes for the natural environment and its many beneficiaries at local catchment, national and in the case of climate regulation and biodiversity, potentially international level.'

While the policy is very good at present these alterations would significantly improve the effectiveness, consistency and clarity of this policy.

The Trust welcomes the opportunity to be consulted during the period of development of the GI Strategy.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 147\11

**Respondent:** Bath Green Party

**Representation (soundness):** The description of what constitutes the Green Infrastructure is not clear. We would like to be involved in defining it (reference to Core Strategy Options document)

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 153\1

**Respondent:** Claverton Parish Council

**Representation (soundness):** The evidence base regarding considerations related to the Kennet and Avon Canal is totally inadequate and the Core Strategy is silent regarding planning, delivery and coherence with the strategies of neighbouring Wiltshire Council. The Kennet and Avon Canal is a unique and significant heritage feature, with a large section located within The City of Bath World Heritage Site landscape setting, the Cotswolds Area of Outstanding Natural Beauty and neighbouring County of Wiltshire. There are a number of important considerations related to the canal, including - social, housing, environment, planning, heritage, leisure and tourism. However, the Core Strategy only contains two very short references to the canal - Policy B1 (Natural and Built Environment - page 34) and 5a (Setting the Agenda) - paragraph 5.04, page 92, the latter simply being a brief description of its geographic location. In addition, Diagram 20 fails to identify the canal as part of Green Infrastructure Network (page 119).

This poor representation or profiling of the many considerations related to the canal also does not reflect previous Claverton and Bathampton Parish Council representations on the Core Strategy Spatial Options, the activity of the British Waterways Mooring Strategy Steering Group (MSSG) or other parallel canal initiatives, e.g. the fundamental change of British Waterways to charitable status and the re-energisation of the Kennet and Avon Partnership Board of which B&NES is a member. It is also noted that the Core Strategy Spatial Options Document - Consultation Report has disregarded the comments and recommendations made by Claverton and Bathampton Parish Councils.

The Core Strategy contains no policy statements about the canal. The 2007 B&NES Local Plan contains only one Policy - HG.14a (Permanent residential moorings). The need to profile adequately the Kennet and Avon Canal has also been articulated in the recently approved Bath World Heritage Site Management Plan (2011-2016). This key document makes the following statement - "There is a need to promote understanding that the River Avon and Kennet and Avon Canal are integral to the Site's landscape setting and a need to ensure they are managed appropriately"

**Change sought to make sound:** We recommend the following two changes to the Core Strategy in order to make it sound -  
1. The following three paragraphs should be added to Policy CP7 as section 6.61 on page 119. We recognise, given that key considerations regarding the canal cut across a number of Core Strategy Policy areas, it is difficult to identify exactly where to insert an amendment. However, we consider that CP7 is an appropriate location, given the natural fit with paragraph 6.60 (the canal is an important

cross-boundary G1 issue) and our second recommendation regarding the Green Infrastructure Network.

"6.61

Management of the Kennet & Avon Canal is a significant B&NES/Wiltshire cross-boundary G1 issue. The canal is a unique and important heritage feature; with a large section located within The City of Bath World Heritage Site and its landscape setting, including that part which is designated as Cotswolds Area of Outstanding Natural Beauty.

As a founding member of the Kennet & Avon Canal Partnership, B&NES recognises that, since the adoption of the 2000 Conservation Plan, there has been a significant increase in the number of boats using the western end of the canal and a step change in the recreational use of the waterside path and environs. It also accepts that a small section of the boating community will continue to choose to live on the canal.

B&NES accepts the MSSG Vision of the Kennet and Avon Canal and will play an active role in the re-energised Partnership Board to ensure that (a) British Waterways fulfils its statutory responsibilities for managing the canal and protecting the attractive waterside and landscape environs and (b) all canal users comply with planning policy and environmental health legislation.

2. The Kennet and Avon Canal should be identified as part of the Green Infrastructure Network (page 119 - Diagram 20) and the accompanying text amended appropriately.

We consider that inclusion of the above two amendments will make the Core Strategy sound by:

- (a). ensuring that the evidence base is more robust
- (b). local community/cross-boundary stakeholders are identified
- (c). key canal issues are better profiled
- (d) B&NES commitment to management of the many issues related to the canal is better described.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 154\5 S

**Respondent:** British Waterways

**Representation** We are pleased to note that a comprehensive list of direct and indirect benefits of GI is listed and that  
**(soundness):** the core Strategy recognises the need for GI policies to be cross boundary as many of the assets such as the river and canal pass through more than one Local Authority area. British Waterways believe that the Introduction to the Green Infrastructure Policy could be improved in that it uses the definition used in PPS12 and it is not immediately clear that this definition encompasses 'blue infrastructure and blue spaces' such as waterways.

Later on the text makes it clear that Bathnes considers waterways as important GI assets but this could however be made clearer at the outset and in the glossary where the term Green infrastructure is further defined.

**Change sought to make sound:** Highlight 'blue infrastructure' in the definition in the same way as used in Policy KE1.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 225\3

**Respondent:** B&NES Allotments Association

**Representation** B&NES Allotments Association has approximately 300 members, almost exclusively from among Bath  
**(soundness):** city allotment tenants. However, our Objectives include the establishment of allotments throughout the District and we work with the town and parish councillors and allotment representatives, and private landlords, to that end.



Increasingly, allotments are seen as one point on a spectrum of local food production which might include: raised beds, private gardens, miner's style long gardens, allotments, community gardens/orchards, smallholdings, community supported agriculture and farms. Although this range is hinted at in references to local food within the general text of the Core Strategy, this coherence is lacking in the treatment of allotments in the structure of the Core Strategy which links objectives to policies and delivery mechanisms to monitoring indicators.

Working back from the monitoring indicators for Objective 6, Plan for development that promotes health and well being, allotments are dealt with either as by-products of developer contributions from Bath Western Riverside, development in Keynsham and the Somer Valley and other unspecified development, or as a contributor to air quality management.

Allotments are also mentioned in relation to the Green Infrastructure Strategy, but it is a weakness of the Core Strategy that the Green Infrastructure Strategy has yet to be developed. As the Place-making Plan is not available either yet, the lack of information limits what constructive comments we can make about the Core Strategy.

However, we are glad to see that the Core Strategy provides general support for allotments (e.g. 2g, 2.49) and the commitment to maintaining, protecting and enhancing allotments as a component of the green infrastructure in Policy CP7. The retention of policy CF.8 is also noted with approval.

**Change sought to make sound:** DCLG has reissued PPS3, which now excludes private residential gardens from the definition of 'previously developed land'. This requires the definition of 'brownfield land' to be updated. PPS3 should be added to the National Policy documents listed for DWI.12, Green Infrastructure, since PPS3 covers the protective legislation for allotments.

Existing and potential allotments provisions which mirror the traditional miner's cottage long-gardens and self-sufficient tradition are included as an asset for Radstock but omitted from the neighbouring old mining community of Midsomer Norton and other mining villages. This asset should be recognised for the whole of Somer Valley and, arguably, as a model for the District as a whole.

The lack of adequate garden space in new developments is a deterrent to families growing their own food and increases demand for allotments.

The need for allotments is given specific mention in certain localities only, for example Keynsham. Allotments legislation requires the relevant local authorities to provide allotments to meet demand, so there should be no implication otherwise, as currently most localities do have unmet demand.

2.2 The need to strengthen the role of allotments within a coherent policy for Local Food

As discussed in paragraph 1 above, the Core Strategy addresses allotments either as a by-product of development, through developers' contributions (policy CP13), or in an as yet unspecified way pending the development of the Green Infrastructure Strategy, under policy CP7, Green Infrastructure. This is a weakness which renders the Core Strategy unsound.

A new policy, specifically for Local Food, which incorporates allotments as one method of local food production, should be developed. Cross references should be made between the Local Food policy and policy CP13 in relation to allotment provision, but also encouraging the provision of adequate sized gardens, community gardens and orchards, within new developments. This would meet both Objective 1, Pursue a low carbon and sustainable future in a changing climate, and Objective 6, Plan for development that promotes health and well-being.

The Local Food policy should define 'local', i.e. proximity, for different types of food production, e.g. allotments should be provided within 600 metres of residence, as set out in the Green Spaces Strategy. Proximity definitions would need to be defined, but - for example - commercial horticulture of vegetables and fruits within 5 km, meat and poultry within 8 km. Time and volume-based targets

should be set, so that for Bath an example would be: "By 2026, half the fruit and vegetables consumed will be grown within the city boundary, including in: gardens, allotments and smallholdings, market gardens and community supported farms." This would return Bath to the horticultural productivity levels of the 1950s.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 233\2

**Respondent:** Avon Valley Farm

**Representation (soundness):** Whilst we support the overall intentions of B&NES Core Strategy Development Plan Document (DPD), we feel that there has been insufficient thought and support given to the role that the Avon Valley can play in the strategic development and revitalisation of Broadmead, Keynsham and Somerdale. This could be greatly enhanced by the integration of water compatible Flood Risk Management Infrastructure at Avon Valley that is compliant with Planning Policy Statement 25 (Development and Flood Risk) and linked to jobs, tourism and business growth.

As a major landowner upstream of Somerdale, Keynsham and Broadmead (and Bristol), we feel that the Strategic Vision for Keynsham in the Core Strategy does not wholly consider the social, environmental, economic and resource use potential of Avon Valley and the River Avon. Similarly, the strategic role that our land in Avon Valley could play in the compensation of lost flood plain, raised defences at Broadmead and Somerdale, and the significant demand from Bristol City for upstream 'volume for volume' flood compensation infrastructure to offset climate change flood predictions (see Bristol Avon Catchment Flood Management Plan 2009, B&NES Strategic Flood Risk Assessment 2008 and B&NES Flood Risk Management Strategy 2010). Flood Risk Management has not been sufficiently Justified in the Core Strategy nor by IDP Reference K1.2 of Table 6 on page 73, which only identifies Somerdale for flood protection measures even though the B&NES Infrastructure Delivery Programme (2010) clearly states "...works on site or upstream". The requirement for upstream flood risk management infrastructure is further supported by the suite of Level 2 SFRA maps and the options ranking table of the Outline Appraisal for Keynsham (Flood Risk Management Strategy 2009) that included 'Rural land use change upstream of Keynsham' and 'Storage / wetland creation upstream of Keynsham on the River Avon and River Chew'.

The Vision for Keynsham in the Core Strategy does not Justify the potential for increasing upstream flood plain storage capacity outlined above, which is clearly omitted from the map in Diagram 12 on page 65. Similarly, the Vision for Keynsham does not Justify the potential role our land could play in linking the proposed development in the High Street, Somerdale and Keynsham railway station to the Avon Valley and other successful businesses via the River Avon which should act as blue infrastructure for locals, visitors and tourists alike. Again this is clearly omitted from the map in Diagram 13 on page 67, which could further help Keynsham capitalise on this resource by including the river upstream of Keynsham for increased recreational activity, tourist attraction and consequential footfall to Keynsham High Street. A ferry boat could also provide a vital transport link between Keynsham railway station, Broadmead Industrial Estate (100 people work each day) and Saltford. By including the River Avon and Avon Valley into these two diagrams rather than ignoring their potential, B&NES would provide for a more Effective and Sound infrastructure delivery plan.

The Avon Valley Farm of 170 acres is on land that has been occupied for hundreds of years and is believed to have been the first occupied farm in the area (pers comm). The Avon Valley Adventure and Wildlife Park occupies 50 acres, including flood plain at the northern periphery and is classed for recreational use. The Park has been successfully trading for over 20 years and is all funded by private investment. It attracts around 95,000 visitors per annum including 170 school visits in June and July and is the only visitor attraction of its type in B&NES. The facility provides fun and interactive teaching and learning opportunities for children and adults alike, allowing access to animals and habitats that are conversant with sustainability and provide understanding of the world we live in. We provide jobs, recreation, leisure, education in an inclusive environment.

With increasing flood risk, our mitigation strategy is to free-up the flood plain and adjacent land for uses that are resilient to climate change, particularly river flooding. We have the capacity to incorporate flood compensation measures that would quickly capture and slowly release 'volume for volume' flood water to the benefit of our own site and downstream developments in Broadmead, Keynsham, Somerdale and Bristol. The proposed Avon Valley Marine Park would play a vital role in creating temporary and full time jobs, increase tourist footfall, provide evening and weekend economy uses, increase the volume and value of biodiversity and habitats in a purpose built, flood resilient marina and ecological water park. It will also act as a balancing tank for flood waters and add value to the continuing diversification of our generational farm. Our land is strategically positioned for this type of development and it is sufficiently distant downwind from the Broadmead sewage treatment works, industrial buildings and proposed materials recycling facility so as not to cause potential nuisance. Our outline scope is available to B&NES on request.

By embracing the Avon Valley into the Core Strategy, we can play our role in enhancing Keynsham, improving the economy, future proofing our key assets, capitalising on our river location and help Keynsham to remain proud and independent. It will also provide opportunity to attract investment and jobs to the peninsula around a unique recreational and educational facility in B&NES.

**Change sought to make sound:** The following recommendations are for your further consideration, adoption or rejection in order to justify an Effective and Sound Core Strategy:

1. Diagram 12 on page 65 should identify the connectivity of Avon Valley and Broadmead to Keynsham via the Green Infrastructure Link as defined on Diagram 20 of page 119. We are awaiting the publication of B&NES Placemaking Plan and B&NES Green Infrastructure Strategy with much interest.
2. Diagram 13 on page 67 should make reference to the close proximity of the canal and River Avon to Keynsham railway station and its potential for upstream and downstream trade, transport and tourism
3. Section 3.15 on page 63 should read "The role of the town centre and Somerdale as the main focus for business activity will be complemented by the Broadmead/Ashmead/Pixash Industrial Estate area and Avon Valley Parks."
4. Section 3d on page 64 should read "Retain the Broadmead/Ashmead/Pixash Industrial Estate and Avon Valley Parks as an area for business activity (use classes B1, B2, B8 and D2e) complementing the role..."
5. Section 3.18c on page 68 should read "Facilities within and adjacent to the town that provide opportunities for leisure and recreation, such as the Memorial Park, a leisure centre, the Fry Club and Avon Valley Adventure and Wildlife Park."
6. Section 3.18e on page 68 should read "The proximity of the railway station to the High Street, Somerdale and River Avon."
7. Section 1 Key Opportunities on page 71 should include a third item, "c Broadmead and Avon Valley"
8. Section 3 Placemaking Principles on page 71 should read "g Retain and enhance the leisure and recreation function of the town centre, Somerdale and Avon Valley
9. Section 3 Placemaking Principles on page 71 should read "h Enhance the rivers, parks and green spaces and link them together to form an improved green and blue infrastructure network (linking the town internally and to its environs)."
10. Section K1.2 of Table 6 on page 73 should read "On site or upstream works necessary to obtain planning permission."

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 245\9 S

**Respondent:** Environment Agency

**Representation (soundness):** We support the inclusion of a green infrastructure policy, particularly the reference to sustainable water management and wildlife that was made in the supporting text in terms of the multi-functional role Green Infrastructure can have.

We are pleased to see that river corridors have been highlighted in the text and Diagram 20 as a key asset.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 246\6 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.

31.Green Infrastructure.  
Page 118 paragraphs 6.55 to 6.58  
Page 118 Policy CP7

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 257\10

**Respondent:** Valley Parishes Alliance

**Representation (soundness):** Kennet and Avon Canal

The Alliance fully supports the detailed representation made by Claverton Parish Council on this matter. In negotiation between the VPA and B&NES an addition to the text of policy CP7 at paragraph 6.61 was agreed and is recommended below:

**Change sought to make sound:** Insert as paragraph 6.61:

Management of the Kennet and Avon Canal is a significant B&NES/Wiltshire cross-boundary G1 issue. The Canal is a unique and important heritage feature, with a large section devoted located within the City of Bath World Heritage Site and its landscape setting, including that part which is designated Cotswolds Area of Outstanding Natural Beauty.

As a founding member of the Kennet and Avon Canal Partnership, B&NES recognises that there has been a significant increase in the number of boats at the western end of the canal and a step change in the recreational use of the waterside path and environs. It also accepts that a small section of the boating community will choose to continue to live on the canal.

B&NES will play an active role in the re-energised Partnership Board to ensure that (a) British Waterways fulfils its statutory responsibilities for managing the canal and protecting the attractive waterside and landscape environs and (b) all canal users comply with planning policy and environmental health legislation.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 262\4

**Respondent:** Woodland Trust

**Representation (soundness):** Whilst we are pleased to see Policy CP7 on green infrastructure, and the mention of street trees and woodland in paragraph 6.57, we would like to see this section clearly support the role that native woodland creation can play in delivering green infrastructure to enhance local neighbourhoods. We look forward to seeing this also incorporated in the proposed Green Infrastructure strategy.

Trees and forests are crucial to life on our planet. They stabilise the soil, generate oxygen, store carbon, play host to a spectacular variety of wildlife, and provide us with raw materials and shelter. They offer us respite, inspire our imagination, creativity and culture, and refresh our souls. A world without trees

and forests would be barren, impoverished and intolerable. Woods bring many benefits, and people appreciate them in all sorts of ways. But for everyone to enjoy them, visit them or indirectly gain from them, they need to be located near to where people live.

- Woodland creation is a key delivery component of Government policy to improve peoples' quality of life. Caroline Spelman, Environment Minister has clearly set this out: "Now let me turn to our environment and, specifically, to our trees. Because if ever organisms demonstrated their ability to multi-task, it's trees. They capture carbon and hold soils together, prevent flooding and help control our climate". (Speech at Angela Marmont Centre for Biodiversity, 20 May 2010).
- The Woodland Trust believes that woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits – see our publication Woodland Creation – why it matters (<http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx>). These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets).
- The Government's UK Low Carbon Transition Plan (presented to Parliament July 2009) has significantly raised the target for new woodland creation, for both climate change mitigation and the other benefits that woodland delivers. It states – 'Woodland creation is a very cost-effective way of fighting climate change over the long term, but it requires an upfront investment. The Government is already doing this: woodland creation represents 60% of the grant aid administered by the Forestry Commission. But to realise the potential for 2050, we need to see a big increase in woodland creation – and we need to plant sooner rather than later. The Government will support a new drive to encourage private funding for woodland creation. If we could create an additional 10,000 hectares of woodland per year for 15 years, those growing trees could remove up to 50 million tonnes of carbon dioxide between now and 2050'.
- The Plan goes on to set out the other benefits derived from woodland creation: 'Well-targeted woodland creation can also bring other benefits, including a recreational resource, employment opportunities, flood alleviation, improvements in water quality, and helping to adapt our landscapes to climate change by linking habitats to support wildlife. The Government will ensure that woodland creation policies continue to respect the benefits and demands of landscape, biodiversity and food security. This will allow businesses and individuals to help the UK meet its carbon budgets, whilst delivering the other benefits that woodlands can bring'. The Forestry Commission are now leading a Woodland Carbon Task Force, a multi-disciplinary team set up to facilitate "...a step-change in woodland creation for all that new woodlands can contribute to society – not just for carbon" (FC Policy & Programmes Group Update Note 019, March 2010).
- This message has been further bolstered by the Read Report (A National Assessment of Forestry and Climate Change, Forestry Commission, 2009) published by the Forestry Commission. In answer to a written Parliamentary question on the Report (from Joan Walley MP, 2/11/10), The Minister of State for Agriculture & Food Jim Paice replied: 'The role of trees in helping society to adapt is also important, and we have indicated that we will launch a tree planting campaign later in the year, addressing the report's recommendations that tree planting should be targeted to where people live and congregate'.
- As referred to above, in a letter to all Local Authorities calling for support for the Government's National Tree Planting Campaign ('The Big Tree Plant'), the Environment Minister Caroline Spelman has extolled the many virtues of trees: 'Trees offer so many benefits to our citizens. They capture carbon and hold soils together, prevent flooding and help control our climate. They also add immeasurably to our quality of life by making areas more attractive and healthier places to live. In recent years the number of trees being planted annually across the country has declined, and could decrease further, unless action is taken to reverse this trend' (letter to all Local Authorities, 12th November 2010).
- It is worth mentioning that the Minister of State for Agriculture & Food Jim Paice stated in an appearance before the Lords EU Agriculture and Environment Committee on 24th November 2010 that: 'I want to see a significant extension of forestry and woodland planting in this country. I certainly see the Forestry Commission as taking a greater enabling role in that'.
- An important publication from the Forestry Commission, The Case for Trees in development and the urban environment (Forestry Commission, July 2010), sets out 'The multiple value of trees for people

and places – increasing greenspace and tree numbers is likely to remain one of the most effective tools for making urban areas more convivial’, and lists (on p.10) the benefits as –

- Climate change contributions
- Environment advantages
- Economic dividends
- Social benefits.

- The South West Forestry Framework Implementation Plan 2009-2012 (Forestry Commission, 2009, Action 2.3) highlights the need to “Encourage tree planting and woodland establishment”, and this is repeated in Action 3.6 -“Develop spatial framework for targeting tree planting and woodland creation”.
- Support for woodland creation is becoming widely embodied in the Local Development Plans process across the country. Stockport Metropolitan Borough Council, in its LDF Core Strategy (submission version, June 2010), states that: ‘Trees and woodlands are vital in maintaining and improving the quality of life for the inhabitants of the Borough’ (para 3.347), adding that: ‘Proposals that will result in an increase in the woodland cover of the borough (including planting of trees as a bio-fuel crop) will be given positive consideration as long as it is not harmful to existing habitats or eco-systems’ (para 3.324).

The Trust can also help with delivery of woodland creation for green infrastructure –

- The Trust has a flexible woodland creation delivery tool called MOREwoods (<http://www.woodlandtrust.org.uk/en/plant-your-own-wood/morewoods/Pages/freewoods.aspx>) that can be tailored to the requirements of individual landowners – private, public or corporate. We can promote, advise, manage and deliver a woodland creation scheme for you, creating vital areas of new woodland for your community. We can also help with flagship educational or community tree planting events.
- One example of a successful local authority woodland creation partnership is the Essex Works programme in 2008/09 with Essex County Council. Prompted by a vote from residents, Essex pledged to plant 250,000 trees to enhance ecology and improve quality of life. Working with the Woodland Trust and a range of partners including district and parish councils, 421,000 trees were planted – far exceeding the original target and helping attract additional funding – see <http://www.woodlandtrust.org.uk/en/plant-your-own-wood/being-planted/pages/public-sector-businesses.aspx>.
- Another example of a successful local authority woodland creation partnership is an ongoing partnership scheme developed in South Hams District Council/Plymouth City Council - <http://www.woodlandtrust.org.uk/en/news-media/releases/Pages/south-hams-planting.aspx>. The project will see more than 30,000 native trees create 50 acres of new native woodland.

**Change sought to make sound:** We would like to see Policy CP7 and paragraph 6.57 support the use of native broadleaf woodland creation as a key tool for delivering green infrastructure, and for this to be backed up in a Trees & Woodlands Supplementary Planning Document (SPD).

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\21

**Respondent:** The Bath Society

**Representation (soundness):** We note and very much support the continued emphasis on high quality design, including the references to the historic environment, and the importance of Bath’s landscape setting [ CP 6 Environmental Quality] .It is noted that a ‘Green Infrastructure Strategy’ is being prepared [ CP7 Green Infrastructure] and we support the emphasis being put on the ‘river corridor through Bath’ as a key green infrastructure(GI) asset. However, does the Authority have the resources and expertise to protect this corridor ? We are aware that GI Strategies are emerging in many parts of the UK now and hope that lessons and ‘best practice’ examples will be drawn from these. We note that the Green Belt [ Policy CP8 ] is seen to play ‘a vital role in maintaining the setting of the World Heritage Site of Bath’ ( para 6.61), a position which we very much support.

**Change sought to make sound:**

**Representation (legal compliance):** It is noted that a 'Green Infrastructure Strategy' is being prepared and we support the emphasis being put on the 'river corridor through Bath' as a key GI asset . However, does the Authority have the resources ( manpower and expertise) to properly protect this corridor ?

We are aware that 'GI Strategies' are emerging now in many parts of the UK and hope that lessons and 'best practice' examples will be drawn from these.

**Change sought to make legally compliant:**

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**Reference:** 274\2 5

**Respondent:** Sport England

**Representation** 3. COMMENT – Green Infrastructure Strategy

**(soundness):** Sport England supports the development of a Green Infrastructure Strategy but seeks confirmation that this includes playing pitches and other sport and recreation spaces.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 276\7

**Respondent:** Hignett Family Trust

**Representation** The policy as drafted fails to link the opportunities to secure GI as part of mitigation strategies

**(soundness):** associated with development , particularly major development.

The key role of GI is at urban areas providing greater opportunities for communities to access and experience a network of multi-functional green spaces which supports natural and ecological processes and is integral to the health and quality of life of communities. Bath is the largest urban area in the district containing over 50 % of the population and 70 % of the employment. Despite its apparent wealth and high house prices, it suffers considerable economic deprivation ,health inequalities and an ageing population. Details of the state of the city are well documented by the Council in their latest studies, which will be referred to at the inquiry.

Therefore the policy together with the Illustrative plan fails to indicate the importance of GI at the urban area , within and at the fringes , to help support the health and quality of life of deprived communities. The Council's studies show the extent of deprivation including health inequalities is most apparent in South Bath although there are pockets of deprivation elsewhere in the city.

Access on foot , bicycle or by public transport to GI in these locations are likely to have significant benefits and should be prioritised.

The Diagram 20 only shows GI in Bath through the River Corridor which although important , contains much pedestrian and public access already through formal parks and corridors. The plan should show at a great scale or describe in words the desire to extend the GI network throughout the City and in particular the southern neighbourhoods to address health and quality of life issues.

The Policy fails to address opportunities to secure GI through major development that can help link up fractured or disconnected corridors and provide greater accessibility to communities through the urban area and outwards into the Countryside. The policy should be amended to secure opportunities at major development schemes as without this , the means of delivery through adopted policy will not exist.

Finally the policy fails to recognise the opportunities for GI at specific strategic allocations in the CS. The New Neighbourhood at Odd Down will provide a major opportunity to secure GI, details of which are set out below, following earlier representations to the CSSO. The absence of tangible progress of the Council's GI Strategy and Delivery Plan means that assessing the proposals and the policy against the Council's adopted Green Space Strategy was undertaken.

## 5 A Provisional Green Space/Infrastructure Strategy at the New Neighbourhood . Odd Down.

### 5.1

5.1.1 The Council's Core Strategy Spatial Options Document calls for certain Key Infrastructure and Delivery requirements. Under the Green Infrastructure heading it is stated that "the provision of Green Infrastructure will need to be made in accordance with the Council's Green Infrastructure Strategy which is currently being prepared". We are also advised that "Strategic Green Infrastructure 'corridors' will be included within urban extensions".

5.1.2 In the absence of a Council GI Strategy it is informative to examine their Green Space Strategy formally adopted in March 2007. This was produced in response to pressure from the Audit Commission and Government Guidance in PPG17. The strategy looked at all freely accessible green space, regardless of owner or manager, and divided it into three land types: formal green spaces (parks, gardens, recreation grounds and open spaces), natural green spaces (woodland, natural and semi-natural areas) and allotments. After examining the evidence the standards agreed for new development were as follows:

- Type of Green Space Standard (sq. m. per person)
- Formal 15
- Natural 15
- Allotments 3

5.1.3 In order to apply this standard to the proposed new neighbourhood, some assumptions are required on the likely population levels. For the purposes of these provisional representations we will take this to be some 3,400 people, of all ages, living in some 1,500 dwellings. On this basis the 2007 GSS would require some 5.1 hectares of parks, gardens, Bath and North East Somerset's Core Strategy – Publication Stage Representation Form recreation grounds and open space, some 5.1 hectares of woodland, natural and semi-natural areas and some 1.03 hectares of allotments.

5.2 How might this requirement be met within option SWB2, the Odd Down Plateau? The starting point in answering this question is the existing green infrastructure and that which will be required as a result of known constraints. There is already extensive tree planting and other natural green space on the plateau, see attached plan. The tree belts to the east of the plateau along South Stoke Lane (which may need to be widened and strengthened) and to the southern edge already comprise some 3.65 ha. Sulis Manor sits in some 3.2 ha of landscaped grounds including mature tree belts and more formal gardens. Depending upon its use, this has good potential to fulfil a significant proportion of the formal landscaping requirement.

There is a well established Public Footpath network with east-west routes to the north and the south of that part of SWB2 to the east of Combe Hay Lane.

Immediately east of Combe Hay Lane is a partially undermined field of some 4ha which is less attractive for building and could therefore play a significant role in the provision of green space, either as a recreation area if restored, or as more formal parkland. The Wansdyke Scheduled Ancient Monument should be respected and its setting enhanced so that it may be better appreciated than at present. This will require a linear green space to the south of the SAM to continue that already created during the development of Sulis Meadows. If this is based on the same 25m width, then this will generate some 2.5ha of formal green space in addition to that already in place.

Playing fields exist at the Odd Down Football Club and also at St Gregory's School. However, a cricket pitch was lost during the recent re-development of the St Martins Hospital site, and the Hayesfield School playing field site is designated for retail/mixed use in the current local plan. Funds are expected to be obtained from these developments to upgrade existing sports facilities elsewhere on Odd Down. To the west of Combe Hay Lane, there is significant planting associated with the Park & Ride which might be adapted if this location is to become an employment site. To the north of the A367, there will be considerable landscaping requirements if the Park & Ride is to be re-located to this part of the



plateau. Our landscaping assessment finds that this area has considerable exposure to the west and north and this would require substantial carefully designed screening if the impact is to be kept to a satisfactory minimum. Similar considerations apply to the Fuller's Earth Works site, proposed as a Waste Treatment Location but not included, at present, in the Council's definition of SWB2.

5.3 What are the opportunities for the provision of Green Space/Infrastructure on land adjacent to the plateau land in Green Belt? The present extensive public footpath network on and around the Odd Down Plateau as defined in SWB2 is a matter of record. The Core Strategy Document states "this location (SWB2) also has the potential to offer significant access to informal green space and to ecological enhancements and management of the surrounding countryside could be explored". It also states "opportunities for this area to link to the countryside are apparent and therefore links to local food production might be achieved". The Urban Extension Core Strategy Information Paper proposes Green Infrastructure Opportunities of SWB2 thus: "Development could link into the numerous footpaths in the area. The nearby Middle and Vernham woods (to the north west) and Horsecombe Vale (to the east) provide further Green Infrastructure opportunities."

5.4 Provisional Green Space/Infrastructure proposals:

5.4.1 Allotments: land to the south of the Odd Down plateau and to the east of the Combe Hay Lane is in the ownership of the Hignett Family Trust. An area of this, extending to perhaps 2ha, lends itself to the provision of a substantial allotment space on south facing land of reasonable quality, at present in arable production. This would be accessed on foot from the existing public footpath down the track at the south west corner of Sulis Manor's grounds. It would also be accessible by vehicle via the Old Combe Hay Lane and the Old Fuller's Earth Workings location. This would not only fulfil B&NES' s existing Green Space standards (see above, 1.03ha required for the new neighbourhood) but also meet the existing well documented shortfall in allotment availability in Sulis Meadows and the wider Odd Down community. Based on approximately 350 dwellings on Sulis Meadows, an anticipated population of some 800 people would require approximately 0.24 ha of allotments under current Council standards. This would still leave further allotment space of some 0.73 ha capable of serving a wider population of some 2,430 people to assist in meeting the acknowledged shortfall of allotments elsewhere in the city (e.g. at Lyncombe). It is perhaps worth noting that South Stoke already has sufficient village allotments from the Hignett Family's land via a long standing arrangement with the Parish Council.

This provision of allotments will not only meet a conveniently, well located need, it will ensure meeting the Council's new standard of provision for new development and make up for the current shortfall in the surrounding community. It will also make provision of a healthy lifestyle accessible to all and thereby improve significantly residents' quality of life and health.

Proposed Green Infrastructure at New Neighbourhood Odd Down

5.4.2 Enhanced access: The valley land to the south of the plateau has been farmed by the Hignett Family for about 100 years. It has been very carefully managed throughout that time to enhance and to safeguard an exceptional ecosystem. It contains many rare and important species. This is a very significant resource which must be guarded with great care for future generations. While, in principle, enhanced access to this resource is desirable it is essential that such access is controlled with the greatest care. With this in mind, a management and resource centre is proposed to be located on the brown field land vacated by the Fuller's Earth Grove Mine facility, with access from the Old Combe Hay Lane. Provisionally this location might fulfil a number of roles some of which are set out below. The experience of trying to farm the Odd Down Plateau land between Combe Hay Lane and South Stoke Lane for the past 50 years has demonstrated how essential it is to think through the careful management of public access. The Family's farming policy during that time has largely been dictated by the constraints brought about by the adjacent urban population. At present there is constant danger of wanton damage (stones thrown at tractors, wire fences cut within days of installation), invasion by youths on motorcycles, arson to crops, machinery and buildings (running to over £200,000 in the past decade), abuse from those asked to return to the extensive public footpath network, the demolition and theft of stone walls etc. etc. There has to be a better way, and it must involve education and explanation followed by a "self-policing ethos" engendered in the public.

5.4.3 The history of the Grove Mine: The Grove Mine was the source of all Fuller's Earth mined in the Bath area from the 1960's until operations ceased in 1980. The clay was extracted on a narrow gauge railway and then tipped into substantial concrete bins prior to being hauled by road to the works for processing. In addition to the bins and the railway there were a number of buildings housing equipment and an electricity transformer supplying the power for lighting the mine, pumping the water from the mine and driving the mining equipment. This location remains a brown field site, unused for agriculture since it is a flat plateau and access roads of made up ground substantially comprising stone ballast. It has underground electricity mains running beneath it, and good highway access from the Old Combe Hay Lane. The land was acquired by the Hignett Family from its former owners and operators, Laporte Industries Ltd., during the 1980's following its repeated illegal occupation by itinerants.

5.4.4 Management/Education/Interpretation/Access Resource Centre: It is provisionally proposed that this location should be considered for a multi-purpose resource centre specifically dedicated to the purposes of managing and maintaining the green infrastructure and bringing access to and knowledge of the Cotswold Area of Outstanding Natural Beauty, its countryside and its heritage, to everyone who visits the City and to those living locally, particularly young people. Amongst other functions, the following may be thought appropriate for further discussion with interested parties:

1. An exhibition/display focusing on the Area of Outstanding Natural Beauty, its distinctiveness and the local fauna and flora and the peculiarities of the local ecosystem: greater horseshoe bats, limestone grassland, orchids, blue butterflies, Bath Asparagus, etc. A nature trail might follow this exhibition, and possibly the opportunity provided in supervised groups to study bat activity on summer evenings etc.
2. An exhibition/display focusing on the local geology and particularly the ground breaking local work of William Smith, the father of English Geology. This could be associated with the history of mining locally including: coal mining in the North Somerset Coalfields, together with the North Somerset Coal Canal and subsequent North Somerset Coal Railway which ran through the Cam valley; Fuller's Earth extraction, processing and its many uses, extending back to Roman times; the (on-going) history of Bath Stone extraction.
3. The Roman and dark ages heritage found locally in the Fosse Way and the Wansdyke. Once again, carefully defined walks including interpretation, might be arranged dedicated to the study of each of these features.
4. Spaces for visiting school parties, disabled access and others, including the disadvantaged, incorporating refreshments and lavatories.
5. Advice and parking for those wishing to access the countryside, whether on foot (walking or running), bicycling or horse riding. The location sits at the crossing of a major north-south route leading from the city to Combe Hay and thence to footpaths and bridleways to the south, and the east-west route from South Stoke and beyond (Horsecombe Vale and the two tunnels project) to Vernham Wood and beyond (the Bath and North East Somerset's Core Strategy – Publication Stage Representation Form Englishcombe Valley).
6. Stabling for horses and bicycle hire facilities.
7. A location for the people and equipment employed in the management and maintenance of all the green spaces of the new neighbourhood.
8. A means of controlling the vehicular access to the allotments and a location where locally produced food might be sold.

5.4.5 Interested Parties for consultation: Local schools, the residents of Sulis Meadows, Combe Hay and South Stoke, Allotment Groups, Bath Organic Group, walking organisations, ornithology organisations, the Cotswold AONB Board, Natural England, English Heritage, the Somerset Coal Canal Society, Riding for the Disabled, all relevant departments in B&NES, Avon & Somerset Constabulary and many others.

5.5 Conclusion: It is clear from the above, that Option SWB2 on the Odd Down Plateau, together with adjoining land that is available, suitable and deliverable, will achieve the objective of meeting and exceeding the current B&NES standards for green spaces in new neighbourhoods.

It is also, hopefully, clear that the location is capable of delivering a series of benefits to the new neighbourhood and to the wider community in the south of Bath which will result in healthier lifestyles and more fulfilled and productive lives for both the existing community and the new neighbourhood.

This is also key objective of these proposals.

Finally the location, features and land at the Odd Down Plateau provides extensive recreational opportunities for the local community, the wider public including tourism, thereby achieving the objective of enhancing access to and understanding of the Area of Outstanding Natural Beauty.

Engagement with interested parties to examine these possibilities in greater detail is sought with a view to setting achievable and desirable policy objectives for the next 15-20 years. In addition to health and quality of life objectives, the opportunities for GI at the New Neighbourhood will benefit important wildlife habitats that support the nearby SAC. Therefore the following objectives will be pursued through GI at the New Neighbourhood:

- 1) Masterplanning to minimise the impact of lighting and disturbance on foraging areas
  - 2) Increasing the area and quality of bat foraging habitat in the Southstoke valley to the south, which is also in the ownership of HFT; to include both improvements to existing habitats, and the conversion of arable land to cattle grazed pasture with optimal management for bats
  - 3) Developing strategic flight lines along Southstoke valley to allow bats safe passage and providing a link to foraging areas in Englishcombe Valley to the north-west
- (Consequently Policy CP7 should include reference to securing valuable GI at the New Neighbourhood Odd Down to benefit both new and existing residents in South Bath.  
Diagram 20 should be amended to take account of the potential opportunities at the New Neighbourhood.)

**Change sought to** Policy CP7 should be amended to prioritise GI at urban areas esp. South Bath .

**make sound:** Policy CP7 should make clear the requirement to secure GI major development sites., including management of GI

Policy CP7 should include reference to securing valuable GI at the New Neighbourhood Odd Down to benefit both new and existing residents in South Bath, including securing a new interpretation centre on the edge of Bath to enhance the enjoyment of GI and the wider countryside ,including the AONB. Diagram 20 should be amended to take account of the potential opportunities at the New Neighbourhood as well as priority areas for GI at south Bath. A revised Diagram 20 is set out below. See also below the plan which could be adapted as an inset plan to Diagram 20.

#### **Representation (legal compliance):**

#### **Change sought to make legally compliant:**

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**Reference:** 279\11

**Respondent:** English Heritage

**Representation** Green Infrastructure

**(soundness):** The heritage value of open spaces with regards to Green Infrastructure planning should be explicitly recognised. For example many of the open spaces that form the network are of historic origin in terms their design, relationship with their surroundings and continued management. Not all of the open spaces are naturally derived.

Also the term 'green' can be misleading, as many of the key open spaces that help define the network are hard in landscape character. Many include a hard surface but 'greened' by tree planting or managed borders. English Heritage or local heritage officers should be included as a key stakeholder in the development of the Green Infrastructure Strategy. It is important to ensure that it is developed from a basis of understanding the heritage value of open spaces and historic landscapes across the district. Many of which are Registered Historic Parks and Gardens, represent a component part of the special character of conservation areas or provide the setting to listed buildings and schedule monuments.

**Change sought to  
make sound:**

#### **Representation (legal compliance):**

#### **Change sought to make legally compliant:**

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**Reference:** 292\15

**Respondent:** Bath Avon River Corridor Group

**Representation** Policy CP7 p118 Over emphasis in green infrastructure as a contrast to settlement and not enough on  
**(soundness):** the economic and 'impact accountability' synergies that need to be established in a more sustainable world.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 314\4

**Respondent:** Helen Woodley

**Representation** The Draft Core Strategy does not include a policy on Local Food Production

**(soundness):** It is I believe unsound because not effective in tackling the causes and effects of climate change without such a policy.

The importance of local food production is noted in many places in the Core Strategy; it relates strongly to the climate change driver; and is mentioned in the Sustainable Community Strategy which anticipates that more local food will become the norm rather than the exception. But local food is only partially supported by the proposed spatial Vision. Some of the built development proposals or options appear to be hostile to the support of local food production.

The Core strategy therefore needs a policy to convert Local Food Production from being aspirational to being deliverable; and to ensure consistent delivery for all local communities, not just selected ones. It would give strength to a local food commitment and better comparability with other local authorities such as Manchester.

Examples of a currently inconsistent approach include:

- Existing and potential allotments provisions which mirror the traditional miner's cottage long-gardens and self-sufficient tradition are included as an asset for Radstock but omitted from the neighbouring old mining community Midsomer Norton.
- The need for allotments is given specific mention in certain localities only, for example Keynsham. Allotments legislation requires the relevant local authorities to provide allotments to meet demand, so there should be no implication otherwise, as currently most localities do have unmet need.
- Local food remains undefined; and in its various mentions has implied inconsistency of meaning.

Several of my comments relate, for example 2976, 2977, 2990, 3005, 3006, 3007

**Change sought to** Suggested Wording of New Policy:

**make sound:** Land most suitable for local food production should be identified for protection before any areas of search for built development, other infrastructure and renewable energy locations. The overarching framework should be the conservation and wise use of land and other resources. Infrastructure design needs to be 'place-making' rather than 'place-indifferent' or 'place-hostile'. In terms of a hierarchy of infrastructure elements:

1. better use of what already exists;
2. elements such as land for local food, green infrastructure and renewable energy that are best suited to specific parts and aspects of the landscape;
3. built elements.

The guiding principle is to facilitate food production close to where people live now and close to where they will be living in the future.

Defining what is meant by 'local food' may be done by estimating a maximum reasonable sustainable travel distance for each type of production or outlet, e.g.: allotment within 600m of existing dwellings and on-site within large developments; community supported agriculture within 2km; commercial

horticulture 5km; meat and poultry 8km.

Local food objectives should be outlined for each locality, for example, for Bath:

"By 2026 nearly half of the fruit and vegetables will be grown within the city boundary, including in: gardens, allotments and smallholdings, community supported farms, shared gardens, and roof-tops."

Targets and benchmark setting:

1. Against locally set objectives.
2. Against other towns, such as Todmorden, which is aiming to become self sufficient in vegetables, orchard fruits and eggs by 2018, and ultimately to source the majority of staple food locally.
3. To reduce food waste. At present, one-third of the country's food production is wasted, and a fair proportion of that is after we have purchased it.
4. To reduce food miles, as part of reaching a broader target to achieve the fossil energy usage of the 1950s, which was about 70% less than today.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 821\4

**Respondent:** Cam Valley Wildlife Group

**Representation (soundness):** It is important that the matter of biodiversity is prominent and that the development of an ecological network is actually perceived as development. It is tempting to see changes in the built environment as 'development' and commonplace to see wildlife and biodiversity conservation viewed as a constraint to development rather than a development opportunity in its own right. Too often is an excellent wildlife resource viewed as land "not being used for anything". This concept, too, must be thrown into touch. The culture of seeing wildlife and biodiversity as less important than economy, transport, housing and so on rather than part of an integrated approach to development is reflected in the failure to produce the Green Infrastructure Strategy ahead of the Core Strategy and in the lack of sufficient attention to the matter of the existing network, with a rather sparse offering presented in Diagram 20; this is completely insufficient.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 821\5

**Respondent:** Cam Valley Wildlife Group

**Representation (soundness):** In the infrastructure section on the Core Strategy, a table sets out the Strategic Objectives against the key strategies and plans. For Objective 2, protecting and enhancing natural heritage, the Green Infrastructure Strategy, The Green Spaces Strategy and the WILDthings Biodiversity Action Plan are cited. The Green Spaces Strategy does not qualify or quantify the wildlife and biodiversity resource, the Green Infrastructure Strategy has not been produced and is unlikely to qualify or quantify the wildlife and biodiversity resource. WILDthings, the B&NES BAP was essentially a set of Action Plans designed to meet the 2010 national biodiversity challenge. All the species and Habitat Action Plans except the Post-industrial Sites Action Plan have now expired and there is no Wildthings officer. Apart from the Post-industrial Sites Action Plan, which is given no officer support, the B&NES BAP appears to be essentially defunct. There has not been sufficient support for the BAP in the past or to the conservation of biodiversity in B&NES. Support for local biodiversity Action Plans is one of the features cited by the Wildlife Trusts that must be actively implemented through sustained support if the NERC Act is to be complied with.

That the key strategic plans associated with the only strategic objective associated with protection of the wildlife and biodiversity resource in B&NES are either inappropriate, non-existent or essentially inoperative, does not inspire confidence in any intention to protect and enhance the wildlife or biodiversity of the District.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 821\12

**Respondent:** Cam Valley Wildlife Group

**Representation** We hoped that, through the Core Strategy, that B&NES would adequately address the matters of **(soundness):** wildlife and biodiversity conservation and enhancement. The Council needs to undertake a comprehensive biodiversity audit and appraisal of populations of important species in a District and wider context and the condition of the habitat resource in the District, for this is well overdue. This information is needed to provide not only baseline information but also the information that the Council will need to draw on in order to produce a Green Infrastructure Strategy that can inform the Core Strategy and play a useful role in wildlife and biodiversity conservation, amongst other things. We wish to stress at this point that a Green Infrastructure Strategy and the biodiversity strategy we hope to see Core Strategy are not synonymous, but that a robust Green Infrastructure Strategy is one of the strategies than can aid and promote biodiversity conservation and enhancement across B&NES.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Diagram 20: Green Infrastructure Network

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**Reference:** 246\20

**Respondent:** Combe Hay Parish Council

**Representation** It is not correct to show the built-up extent of the City Of Bath as including the area along the A367 **(soundness):** beyond the boundary of the City.

**Change sought to make sound:** Delete the extensions showing the built-up City of Bath along the A367.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 264\20

**Respondent:** Englishcombe Parish Council

**Representation** The diagrams appear to extend the urban boundary of Bath southwards down the A367, showing a **(soundness):** small "blister" around the site of the Combe Down Park & Ride. This area and the land around it and to the west of the A367 are within the Parishes of Combe Hay and Englishcombe and are in the Green Belt.

**Change sought to make sound:**

**Representation (legal compliance):** The diagrams appear to extend the urban boundary of Bath southwards down the A367, showing a small "blister" around the site of the Combe Down Park & Ride. This area and the land around it and to the west of the A367 are within the Parishes of Combe Hay and Englishcombe and are in the Green Belt.

**Change sought to make legally compliant:** This "blister" should be removed.

**Plan Reference:** Policy CP8: Green Belt

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**Reference:** 3\1

**Respondent:** Mr Sebastian Greene

**Representation** I am not suggesting that the Core strategy is unsound but it does not maximise the potential of land  
**(soundness):** available in certain locations where Green belt boundaries have been deviated into peoples gardens instead of following the previous line.

An example of this and why I am writing is to request that the plot of land situated above Mulburry house, Golf course road, Bathwick, Bath, BA2 6JG is removed from greenbelt. I am aware that this is just one site and a small consideration compared to the whole core strategy. We have however developed a very environmentally friendly designed house that we believe would be perfectly within keeping of the surrounding area. Currently my grandmother lives in this house and she is now 87 years of age – she needs to have her own independence but also needs to have her family very close by for continued support. My grandmother has owned this land long before the green belt law came into effect and was not personally made aware of these changes to her land. What is also frustrating is that the green belt line does not follow the same line as it enters my grandmother’s land but instead cuts straight into her garden for a reason that we have not been able to have explained to us. We therefore are requesting that the land be removed from the greenbelt and that the boundary is diverted to the same line as it follows before reaching my grand mothers’ land. In the future we would then look to build the environmentally friendly dwelling that was put forward for planning permission back in December 2007. Application number:07/00124/Ful. This land and proposed dwelling would not be used to profiteer (and this can be seen by the design of the house which does not maximise the land available) but literally would enable us to live near to my grandmother as her needs become ever greater as she grows older. I hope that you are able to take this rather unique situation into consideration when looking at the current changes within the Bath core strategy.

I also submitted this to the Core strategy spatial consultation in Dec 2009 but did not receive a response. I am aware that this is just one site and a small consideration compared to the core strategy as a whole but would appreciate if you could take my request into consideration due to the rather unique circumstances of this proposal.

I would be very happy to show you the site in question if you are able to look into this further.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 49\3

**Respondent:** Clutton Parish Council

**Representation** Clutton Parish Council has for many years sought to ensure that its proximity to Bristol and Bath does

**(soundness):** not lead to it growing into a huge dormitory for either of those cities. When proposals were made some years ago for an expansion to the north of Temple Cloud, the Council expressed real concern about the danger that this would lead on to an amalgamation of Temple Cloud with Clutton.

There is an equal danger of development to the west of High Littleton leading to a similar amalgamation.

The current delineation of the Green Belt offers no protection from a gradual erosion of the open spaces (fields) which currently separate the three villages, and it is not at all clear how the policies in the Core Strategy would prevent such erosion (for example, by the use of these fields as exception sites).

**Change sought to make sound:** The Council would like to see the boundary of the Green Belt drawn further south in the vicinity of Clutton, so that it passes between Clutton and Temple Cloud/High Littleton: effectively making Clutton into a village ‘washed over’ by the Green Belt, rather than one which stands on the boundary of the Green Belt.

The adoption of the Core Strategy offers an excellent opportunity to introduce this simple measure of protection for the village over the next generation, and we would like to argue for this amendment to the Strategy.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 73\7 S

**Respondent:** Newton St Loe Conservation Group

**Representation** Core Policy CP8 conforms with national policy which also states that the general extent and detailed **(soundness):** boundaries of the Green Belt should be altered only exceptionally.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 86\1

**Respondent:** Whitchurch Parish Council

**Representation** Whitchurch Parish Council are delighted that the Regional Spatial Strategy and the Urban Extension to **(soundness):** South East Bristol have both been scrapped.

We fully support Policy CP8 Green Belt on Page 120 of the Draft Core Strategy, which sets out the purpose and objectives of Green Belt within B&NES and that the openness of the Green Belt will be protected from inappropriate development .

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 91\3 S

**Respondent:** Mr Simon Haywood

**Representation** This Policy will hopefully protect the Green Belt but there must also be care taken that developers do **(soundness):** not take advantage of the 'Community Right to Build'.

Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 92\3

**Respondent:** Jo Haywood

**Representation** This Policy will hopefully protect the Green Belt but there must also be care taken that developers do **(soundness):** not take advantage of the 'Community Right to Build'.

Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 106\3

**Respondent:** Pro Planning



**Representation** Core Strategy Policy CP8 is ineffective in that it fails to make adequate provision to meet Objective 2 to  
**(soundness):** make: “optimum use of brownfield opportunities in meeting housing and economic development needs.”

There are existing brownfield employment sites within the Green Belt in BANES which are capable of contributing towards local economic growth within the rural areas. The Core Strategy seeks to secure 500 jobs within the rural areas over the plan period. Given that much of the area is covered by Green Belt, Green Belt policies should allow for appropriate forms of development consistent with both national and local Green Belt policies regarding their openness. The Core Strategy is considered to be inconsistent with national policy on Green Belts in PPG2 in that it does not provide for the designation of Major Developed Sites (MDS) in the Green Belt. A number have already been designated in BANES, but not all those which might be deemed to be suitable have been designated, and Green Belt Policy CP8 should recognise this.

**Change sought to** Insert additional paragraph 6.65 at page 120 as follows:  
**make sound:** “Sites already designated as Major Developed Sites in the Green Belt have and are continuing to make a valuable contribution towards economic growth and the prosperity of the rural areas. Other brownfield sites which meet national policy tests for the designation of MDS’s as set out in PPG2 paragraph C1, will be considered for designation through the Placemaking Plan. The objective is to make best use of brownfield sites in rural areas and to increase the opportunities for job creation in the rural areas consistent with both Green Belt policy and the Core Strategy target level for growth in jobs in the rural areas.”

Amend Policy CP8 to include:  
“The detailed boundaries and criteria for development within existing, and where appropriate, new Major Developed Sites will be defined in the Placemaking Plan.”

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 143\7 S

**Respondent:** Bathampton Parish Council

**Representation** We welcome the CS’s support for the protection of the Green Belt. We note its observation that there  
**(soundness):** are places where small adjustments in the boundaries could logically be made. As no action was taken on this in the Local Plan inquiry we consider the issue should now be addressed and support the commentary in the CS.

PPS1 as revised gives primacy to proposals for renewable energy generation over the long-established strong presumption against development in the Green Belt. The CS text should acknowledge that there may arise circumstances in which there could be a conflict between Policy CP3 Renewable Energy and Policy CP8 Green Belt.

**Change sought to**  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 148\4 S

**Respondent:** Bath Chamber of Commerce

**Representation** I am writing on behalf of Bath Chamber of Commerce to express our broad support for the latest Core  
**(soundness):** Strategy Document. We have been appreciative of being fully informed of developments and grateful than 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.

4. That said, we believe there should be a flexible approach to the Green Belt. Of course we do not seek its total destruction, far from it, but we do believe that beneficial development should not be restricted by an overly tight interpretation.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 162\12

**Respondent:** Batheaston Parish Council

**Representation (soundness):** We welcome the CS's support for the protection of the Green Belt. We note its observation that there are places where small adjustments in the boundaries could logically be made. As no action was taken on this in the Local Plan inquiry we consider the issue should now be addressed and support the commentary in the CS.

**Change sought to make sound:**

**Representation (legal compliance):** PPS1 as revised, the government's overarching statement of planning policy, gives primacy to proposals for renewable energy generation over the long-established strong presumption against development in the Green Belt. In view of national policy the CS text should acknowledge that there may arise circumstances in which there could be a conflict between Policy CP3 Renewable Energy and Policy CP8 Green Belt.

**Change sought to make legally compliant:** Reference to possible conflict between Policy CP3 and Policy should be inserted after CS para 6.63 p120CP8

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**Reference:** 177\2

**Respondent:** Mr Derek Satow

**Representation (soundness):** I consider this policy and its supporting text to be sound in all respects and wish to express my strong support for it. The retention of the existing boundary is fully justified by the absence of any compelling evidence to the contrary, in which respect the abandonment of the highly controversial and hugely damaging urban extension proposal is very welcome. I particularly welcome the fact that "to preserve the individual character, identity and setting of ... the villages and hamlets within the Green Belt" is recognized as a purpose of including land in the Green Belt, this being justified as a continuation of its recognition in the current adopted Structure and Local Plans.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 180\18

**Respondent:** J S Bloor Ltd

**Representation (soundness):** The Core Strategy is unsound as it does not alter the Green Belt around Keynsham as advocated in the Secretary of State's Proposed Changes to the RSS. Although the Secretary of State's Proposed Changes to the RSS were not finalised, the evidence base to support the RSS is a material consideration and sets out the exceptional circumstances which justifies the changes to the general extent of the Green Belt. The Interim RSS (ie RPG10 September 2001) set out in Policy SS 4 Green Belt, the need to critically review the Green Belt and examine whether boundary alterations were needed to allow for long term sustainable development needs.

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, and to recognise that the assumptions about density in the Core Strategy are high. Actual density on sites could be much less and in accordance with PPS 3 (June 2010).

The Core Strategy is unsound as it does not meet housing needs. The Proposed Changes to the RSS identified the need to alter the general extent of the Green Belt at Keynsham in order to accommodate an urban extension to meet housing needs. The RSS considered that in order to make the necessary provision for new homes and to fulfil the role of the SSCTs in terms of their economic potential which could not be met in the existing urban areas, then the most sustainable solution is to provide for urban extensions to the SSCTs. This was debated at the Regional EIP and was a recommendation of the Panel. To address these exceptional circumstances, the RSS makes changes to the general extent of the Green Belt, removing the designation from the areas required to accommodate the proposed urban extensions.

The Panel considered that Keynsham was a suitable sustainable location for housing development in order to support economic growth in the Bath TTWA. Keynsham was considered as a suitable location as it would allow development to serve the wider needs of the conurbation. The Panel considered that Keynsham can provide a wide range of community services for new development and that it would be an attractive location for associated employment development. The combination of these factors makes Keynsham a sustainable location. The Panel considered that there was sufficient scope for development around Keynsham to allow development to proceed without threatening the integrity of the separation that the Green Belt ensured.

This was endorsed by the Secretary of State in the Proposed Changes to the RSS. The Secretary of State agreed that Keynsham has a strong function relationship with Bristol and forms part of the Bristol SSCT. It was considered that there were opportunities at Keynsham both for housing and employment to strengthen its role, so it could better serve its own population and that of the surrounding area.

Given the above, land at south west Keynsham is considered to be suitable, available and deliverable. Development south west of Keynsham would not compromise the principles of the Green Belt. Keynsham as a market town should be the focal point for locally significant development including the provision of the bulk of district housing provision outside the Bath SSCT and also taking into account Bristol SSCT, thereby increasing its self containment.

Bloor Homes consider that land to the south west of Keynsham provides the best opportunity to accommodate future housing needs. This area would not lead to the coalescence of Keynsham with Salford. The area is not constrained by flood plain or conservation area, but is within the Landscape Character Area subject to Policy NC1, this is however a local designation. Bloor Homes consider that land to the south west of Keynsham is suitable for an urban extension to meet local needs. The Bloor land control extends to approximately 55.94 hectares which sits between Charlton Road and Parkhouse Lane to the north and Redlynch Lane to the south. (Representations including a Site Location Plan were submitted in response to the Spatial Options Consultation in January 2010.)

(see representations in particular on Policy DW01 and Policy KE1)

**Change sought to make sound:** The Core Strategy should be amended to reflect the latest published household projections in accordance with PPS 3 paragraph 33 so that provision is made for in the order of 18,500 dwellings and the general extent of the Green Belt is redefined at Keynsham so that land south west of Keynsham is removed from the Green Belt and development needs can be accommodated sustainably in accordance with national guidance.

Changes would need to be made to Policy DW01 to increase the housing provision for the plan period to at least 18,500 dwellings. Changes would need to be made to the spatial vision for Keynsham and also to Policy KE1 to reflect the strategic location and the need to make provision for 3,000 dwellings instead of 1,500 dwellings at Keynsham. Policy KE1 would also need to define the general extent of the Green Belt by removing land to the south west of Keynsham from the Green Belt.

Changes would need to be made to Policy CP8 to redefine the boundary of the Green Belt south West of Keynsham.

“The general extent of the Green Belt is set out on the Core Strategy Key Diagram. Land to the south west of Keynsham has been removed from the Green Belt. The detailed boundaries and inset villages are defined on the Proposals Map.....”

See proposed changes to Policy KE1

**Representation (legal compliance):** The Core Strategy is not legally compliant and therefore does not conform generally with the development plan as set out in PPS 12 paragraph 4.50 i.e. it should conform generally to the Regional Spatial Strategy.

The Core Strategy is not legally compliant as it is not in conformity with the RSS, (ie the Interim RSS) and taking into account the evidence base for the latest RSS that has not been progressed beyond the stage of the Secretary of State's Proposed Changes.

The Core Strategy is not compliant as it fails to make adequate provision for housing needs during the plan period. It does not conform to the latest Government guidance in terms of the development plan and the latest evidence base for the SW RSS or the latest DCLG 2008 based household projections. The Councils own Strategic Housing Market assessment indicate that there is a very high housing need, both in household growth and in relation to likely total future supply.

**Change sought to make legally compliant:** The Core Strategy is not legally compliant with the development plan. In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and also consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections in the most appropriate sustainable locations; exceptional circumstances have been demonstrated to make the changes to the general extent of the Green Belt.

**Reference:** 180\23

**Respondent:** JS Bloor Ltd

**Representation (soundness):** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections.

The housing figures for the plan period should be increased to at least 18,500 dwellings

**Change sought to make sound:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections.

The housing figures for the plan period should be increased to at least 18,500 dwellings

**Representation (legal compliance):** Review of Green Belt not carried out

**Change sought to make legally compliant:** Review of Green Belt required

**Reference:** 189\1

**Respondent:** Paul Warner

**Representation (soundness):** I do consider the Core Strategy to be sound if it means NO building on, or changes to Green Belt around Bath. I am slightly worried by the wording 'general extent', which coupled with the wording that says '2,500 homes will come forward within the outer neighbourhoods', could be seen to be ambiguous and allow planning events in the future, which those agreeing to the Core Strategy now thought were excluded.

I would like to know that the proposals specifically do NOT, or will NOT, allow for use of the Twerton Site, which was in the previous Core Strategy. My letter of 12th December 2010 outlines why I thought that those proposals were unacceptable.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 196\2 S

**Respondent:** Christopher Hughes

**Representation**

**(soundness):** I am a resident of BANES and am writing in support of the revised Core Strategy.

In particular I support and find sound:

1. Protection of the Green Belt.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 208\1 S

**Respondent:** Brian C Tanner

**Representation** Both my wife and I are resident in Bath and North East Somerset and we are writing to register out

**(soundness):** joint support for the revised Draft Core Strategy which is currently under discussion.

This is Indeed an important document and the forward confirms that this will enable the Council to shape the physical change within the Bath and North East Somerset Council. The Draft Core Strategy provides the strategic policy to guide the change for the development and the use of the available land for the next 15 years until the year 2026

In particular I commend the Strategic Document for the following proposals:

- 1.0 The Vital importance of enabling protection of the area of the Green Belt infrastructure surrounding Bath is welcomed as noted in Policy CP7

I trust that these comments are helpful in your deliberations.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 222\14

**Respondent:** Duchy of Cornwall

**Representation** Our objections relate to the failure of the CS to plan for an urban extension to the south west of Bath.

**(soundness):** Full details are set out in our separate but related response to Policy DW1 and we rely upon those representations in responding to this policy.

As stated, we are of the view that the allocation of an urban extension to the south west of the Bath urban area is vital to providing for a "sound" CS. In this regard, the Council may wish to consider the content of the Inspector's report into Windsor and Maidenhead's Core Strategy. This is a Borough with similar characteristics to B&NES in terms of the importance of its historic core in heritage terms and the fact that the urban areas are defined by a tight Green Belt boundary.

The inspector ultimately found Windsor and Maidenhead's Core Strategy to be unsound.

The Council's approach leading up to submission of the CS was to maintain their Green Belt boundaries and to rely instead upon housing delivery from sites from within the urban area – including through

windfall. The Inspector reported upon Windsor and Maidenhead's CS in October 2007 – finding the DPD unsound.

Paragraph 11.7 of his report considers that the CS should “adopt a more proactive stance towards a review of Green Belt boundaries”.

The Inspector further comments:

“In my view these reasons collectively amount to the “exceptional circumstances” that PPG2, ¶2.6, accepts can justify a change to an established Green Belt boundary. Arguably the failure to meet the 10 year developable land test does on its own. While the Green Belt obviously enjoys widespread support from the local populace, I am not convinced that a slavish adherence to boundaries established over half a century ago is now in the best interests of the local community. It is important not to lose sight of the fact that the Green Belt is a policy constraint, it is not reliant on landscape quality considerations or the nature conservation value of the land in question.” (Our emphasis).

In terms of providing for the necessary changes to the spatial approach to the Council's housing strategy, paragraph 11.8 of the Inspector's report states quite clearly that:

“To my mind the preparation of the Core Strategy is an opportune time to consider possible revisions to the defined Green Belt boundary in order to ensure a better and more sustainable spatial strategy up to 2026 and indeed beyond (PPG2, ¶2.12). The Core Strategy would retain its focus on previously developed land but would embrace the possibility of some development on peripheral sites beyond existing settlement boundaries.” (Our emphasis)

Against the above background, and for the stated reasons, the LPA should provide for an urban extension to the south west of Bath in the form of a review of the Green Belt in order to ensure the provision of a “sound” strategy in accordance with the requirements at paragraphs 4.50 to 4.52 of PPS12.

The case for a Green Belt release at Bath is even more compelling given the strategic role of the town as a SSCT.

**Change sought to make sound:** The Policy should be amended in accordance with our separate but related objections and suggested changes to Policy DW1.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\56

**Respondent:** Bath Preservation Trust

**Representation (soundness):** BPT considers that Policy CP8 itself is sound, but we are concerned about inconsistencies in the phraseology used elsewhere in the CS, which we believe risks confusion on the part of developers and the LPA about what is intended and therefore jeopardises effective delivery of the policy.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\57

**Respondent:** Bath Preservation Trust

**Representation (soundness):** In particular, paragraphs 1.27 and 1.31 (page 19) state that ‘no changes are proposed to the general extent of the Green Belt around Bath’ while paragraph 1.28 says that ‘No changes are proposed to the Green Belt boundary around Keynsham’. Policy DW1 (page 20) refers to ‘retaining the general extent

of the Bristol-Bath Green Belt with no strategic change to the boundaries'. Policy B1 (page 34) makes no reference to maintaining the Green Belt around Bath, nor is there any mention of Green Belt in Policy B4 (page 53). In relation to Policy B5, paragraph 2.41 (page 55) states 'No alterations to the Green Belt boundary beyond that previously made in the Local Plan are envisaged during the Core Strategy period. By contrast, Policy KE1 (page 64) states at paragraph 1A that the strategy for Keynsham is to 'maintain the Green Belt surrounding Keynsham', and paragraph 6.64 (page 120) states that the boundaries for Keynsham and the villages which are inset within the Green Belt will remain unchanged, presumably for the duration of the CS. These differences in treatment between Bath and the other towns/villages within the Green Belt could be taken to imply that consideration will be given to amending the Green Belt boundary around Bath, for example to accommodate an urban extension.

**Change sought to** Policies B1 and B4 should include references to maintaining the Green Belt around Bath and Policy  
**make sound:** DW1 should clarify what is meant by 'no strategic change' to Green Belt boundaries.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\58

**Respondent:** Bath Preservation Trust

**Representation** The diagrams appear to extend the urban boundary of Bath northwards down the A367, showing a  
**(soundness):** small 'blister' around the Odd Down park and ride. The area and the land around it to the west of the A367 are in the Green Belt.

**Change sought to** Correct diagrams to remove the 'blister' around Odd Down park and ride.  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 229\1

**Respondent:** DPDS Consulting

**Representation** The definition of major (existing) developed sites in the green belt is not consistent, in terms of the  
**(soundness):** definition of appropriate boundaries, with national guidance in PPG2 Annex C.

**Change sought to** Re-definition of the medes boundary to include all the land which forms the site (i.e. all the land in the  
**make sound:** green belt controlled by Monkton school and not merely the area within which infilling would be allowed.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 246\7 S

**Respondent:** Combe Hay Parish Council

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

32.The Bristol/Bath Green Belt.  
Page 120 paragraphs 6.61 to 6.63  
Page 120 Policy CP8

**Change sought to**  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 248\12

**Respondent:** Crest Strategic Projects and Key Properties Ltd

**Representation** 1) RPS does not accept that exceptional circumstances for Green Belt release do not exist. Those  
**(soundness):** exceptional circumstances have been established since RPG10 was adopted in September 2001, nearly 10 years ago.  
2) That clear case has further been proven through the preparation of the RS, and BANES itself has accepted through the submissions it made to that process that the most sustainable locations for growth lie in the SSCTs and on Green Belt land.  
3) The only reason BANES considers exceptional circumstances do not exist is because it is planning for an exceptionally low level of housing and economic growth. This is a wholly ineffective and unjustified stance to adopt and is irresponsible to the point of being reckless. It is unfortunate that local politics and the desire to seek to pander to the loud few should sway the Council to the extent that it is content to jeopardise market recovery and provide sufficient homes for people to live.  
4) Green Belt releases at the SSCTs should, for all the reasons set out in these representations, be a fundamental part of this CS.  
5) These issues go to the heart of the CS and RPS intends to test them thoroughly at examination.

**Change sought to make sound:** 1) The CS is fundamentally flawed. Green Belt releases on the edge of Bristol and Bath are necessary in order for the sub-region to progress and prosper. There is no case for the continued protection of Green Belt in locations where sustainable growth can be delivered. The overall aims of the Green Belt would not be compromised.  
2) The provision of sustainable urban extensions at the SSCTs are the only practicable means of ensuring the needs of the sub-region are met, and this CS has a critical role in delivering them. RPS submits evidence relating to the proposals at Hicks Gate and the justification for Green Belt release in this specific location

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 257\9

**Respondent:** Valley Parishes Alliance

**Representation** The support for the protection of the Green Belt is welcomed but we note there are places where small  
**(soundness):** adjustments in the boundaries would be appropriate. As no action was taken on this in the Local Plan examination we consider the issues should now be addressed and support the commentary in the CS.

PPS1, as revised, gives primacy to proposals for renewable energy generation over the long-established strong presumption against development in the Green Belt. The CS text should therefore acknowledge that circumstances may arise when there could be a conflict between Policy CP3 and Policy CP8.

**Change sought to make sound:** Insert reference to possible conflict between Policy CP3 and Policy CP8 after paragraph 6.63 p120.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\22 S

**Respondent:** The Bath Society

**Representation** We note and very much support the continued emphasis on high quality design , including the  
**(soundness):** references to the historic environment, and the importance of Bath's landscape setting [ CP 6 Environmental Quality] .It is noted that a 'Green Infrastructure Strategy' is being prepared [ CP7 Green Infrastructure] and we support the emphasis being put on the 'river corridor through Bath' as a key green infrastructure(GI) asset. However, does the Authority have the resources and expertise to protect this corridor ? We are aware that GI Strategies are emerging in many parts of the UK now and hope that lessons and 'best practice' examples will be drawn from these. We note that the Green Belt [ Policy CP8 ] is seen to play 'a vital role in maintaining the setting of the World Heritage Site of Bath' ( para 6.61), a position which we very much support.

**Change sought to make sound:**



**Representation (legal compliance):** We very much support this policy, noting that the Green Belt is seen to play 'a vital role in maintaining the setting of the World Heritage Site of Bath' ( para 6.61 page 120 )

**Change sought to make legally compliant:**

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**Reference:** 275\4

**Respondent:** Redrow Homes (South West) Ltd.

**Representation (soundness):** The Core Strategy is unsound as it does not alter the Green Belt around Keynsham as advocated in the Secretary of State's Proposed Changes to the RSS. Although the Secretary of State's Proposed Changes to the RSS were not finalised, the evidence base to support the RSS is a material consideration and sets out the exceptional circumstances which justifies the changes to the general extent of the Green Belt. The Interim RSS (i.e RPG10 September 2001) set out in Policy SS 4 Green Bath and North East Somerset's Core Strategy – Publication Stage Representation Form Belt, the need to critically review the Green Belt and examine whether boundary alterations were needed to allow for long term sustainable development needs.

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 and to allow for a reduced density on sites in accordance with PPS3.

The Core Strategy is unsound as it does not meet housing needs. The Proposed Changes to the RSS identified the need to alter the general extent of the Green Belt at Keynsham in order to accommodate an urban extension to meet housing needs and indicated that provision is needed for 3,000 dwellings. The RSS considered that in order to make the necessary provision for new homes and to fulfil the role of the SSCTs in terms of their economic potential which could not be met in the existing urban areas, then the most sustainable solution is to provide for urban extensions to the SSCTs. This was debated at the Regional EIP and was a recommendation of the Panel. To address these exceptional circumstances, the RSS makes changes to the general extent of the Green Belt, removing the designation from the areas required to accommodate the proposed urban extensions.

The Panel considered that Keynsham was a suitable sustainable location for housing development in order to support economic growth in the Bath TTWA. Keynsham was considered as a suitable location as it would allow development to serve the wider needs of the conurbation. The Panel considered that Keynsham can provide a wide range of community services for new development and that it would be an attractive location for associated employment development. The combination of these factors makes Keynsham a sustainable location. The Panel considered that there was sufficient scope for development around Keynsham to allow development to proceed without threatening the integrity of the separation that the Green Belt ensured.

This was endorsed by the Secretary of State in the Proposed Changes to the RSS. The Secretary of State agreed that Keynsham has a strong function relationship with Bristol and forms part of the Bristol SSCT. It was considered that there were opportunities at Keynsham both for housing and employment to strengthen its role, so it could better serve its own population and that of the surrounding area.

Given the above, land at south west Keynsham is considered to be suitable, available and deliverable. Development south west of Keynsham would not compromise the principles of the Green Belt. Keynsham as a market town should be the focal point for locally significant development including the provision of the bulk of district housing provision outside the Bath SSCT and also taking into account Bristol SSCT, thereby increasing its self containment.

Redrow Homes consider that additional land is needed in order to meet the housing requirement, and that land south of Lays Farm is available and deliverable. (Representations including a Site Location Plan were submitted in response to the Spatial Options Consultation in January 2010.) (see representations in particular on Policy DW01 and Policy KE1)

**Change sought to make sound:** The Core Strategy should be amended to reflect the latest published household projections in accordance with PPS 3 paragraph 33 so that provision is made for in the order of 18,500 dwellings and the general extent of the Green Belt is redefined at Keynsham so that land south west of Keynsham is removed from the Green Belt and development needs can be accommodated sustainably in accordance with national guidance.

Changes would need to be made to Policy DW01 to increase the housing provision for the plan period to at least 18,500 dwellings. Changes would need to be made to the spatial vision for Keynsham and also to Policy KE1 to reflect the strategic location and the need to make provision for 3,000 dwellings instead of 1,500 dwellings at Keynsham. Policy KE1 would also need to define the general extent of the Green Belt by removing land to the south west of Keynsham from the Green Belt.

Changes would need to be made to Policy CP8 to redefine the boundary of the Green Belt South West of Keynsham. The changes to the wording are as follows:-

“The general extent of the Green Belt is set out on the Core Strategy Key Diagram. Land to the south west of Keynsham has been removed from the Green Belt. The detailed boundaries and inset villages are defined on the Proposals Map.....” See proposed changes to Policy KE1

**Representation (legal compliance):** The Core Strategy is not legally compliant as it does not conform generally with the development plan as set out in PPS 12 paragraph 4.50 i.e. it should conform generally to the Regional Spatial Strategy.

In this case the development plan comprises the Interim RSS i.e. RPG10 of September 2001. The evidence base of the latest RSS is a material consideration, although the RSS has not progressed beyond the stage of the Secretary of State's Proposed Changes.

The Core Strategy is not legally compliant as it fails to make adequate provision for housing needs during the plan period. It does not conform to the latest Government guidance of the latest DCLG 2008 based household projections. The Councils own Strategic Housing Market assessment indicates that there is a very high housing need, both in household growth and in relation to likely total future supply.

**Change sought to make legally compliant:** The Core Strategy is not legally compliant with the development plan. In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and also consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections in the most appropriate sustainable locations; exceptional circumstances have been demonstrated to make the changes to the general extent of the Green Belt.

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**Reference:** 276\12

**Respondent:** Hignett Family Trust

**Representation (soundness):** Policy CP8 proposes to maintain the existing boundaries of the Green Belt surrounding Bath. National policy states that the general extent of the Green Belt should be altered only in exceptional circumstances.

The need to provide for sufficient new homes and jobs in the most sustainable locations in B&NES and in particular at the City of Bath means that exceptional circumstances may now exist to alter the detailed boundaries of the Green Belt to accommodate this need during the period of the CS.

The CS concludes that sufficient capacity already exists within the City of Bath (6000 homes) to accommodate the entire growth requirements of the City up to 2026. The policy position is unsound as the Council have over estimated the urban capacity of the City of Bath and its capacity to deliver, underestimated the need for homes and jobs at Bath and have planned to distribute the growth across the district in a manner that will lead to unsustainable patterns of growth, contrary to PPS 12.

The CS and Policy CP8 will be sound if it retains the general extent of the Green Belt between Bristol and Bath, whilst altering the detailed boundary at Odd Down, to accommodate the New Neighbourhood. This alteration will be defined on the Proposals Map. ( The wording of Policy CP8 is amended to take account of the change to the boundary of the Green Belt at Odd Down and the

Proposals Map shall be so altered.

Reasoned Justification:

Alterations to the Green Belt

Alterations to the detailed boundaries of the Bristol- Bath Green Belt have taken place in the past. The most recent alterations were made in the last Local Plan (2007) at Bath University Campus and at Keynsham. Exceptional circumstances existed at that time to allow development to take place on green field /Green Belt land for residential use between 2001 and 2011. The detailed boundaries of the Proposals Plan were altered to accommodate these changes (500 new homes).

In the earlier Bath City/ Wansdyke Environs of Bath Local Plans, the Green Belt area at Odd Down was subject to alteration. This resulted in the present land use allocation at the New Neighbourhood, Odd Down. This allocation led to the new residential development known as Sulis Meadows, the AONB designation and the Green Belt. (See the background details at CSSO Part 1& 2). The majority of the land here being promoted for a New Neighbourhood was recommended by the Inspector at the Wansdyke Environs of Bath Local Plan for development, but the then Local Authority chose to disregard this advice and build at Peasedown St John instead. At that time, some 30 years ago, sustainability was not the major consideration which it has become today.

It is perhaps no great surprise therefore that as a new Development Plan, in the form of the CS, is being prepared, Green Belt review is again part of the process.

Review of the Green Belt

The planning process that has resulted in this CS, arose from a review of the Regional Spatial Strategy, formally RPG 10, in 2004. Whilst the Coalition Government have clearly signalled its intention to scrap the Regional Plans, they remain the Development Plan for the time being and are therefore relevant to this process. Notwithstanding this, the Coalition has signalled its desire for all LPAs to press on with their CS without delay, having regard to an evidence based approach, when drawing up plans and policies in LDDs.

RPG 10, 2001-2016, proposes a review of the Green Belt at PUAs such as Bath. The relevant policies of RPG10 are Policy SS2, SS4 and SS9 incl. the text at 3.25 and 3.26.

Policy SS 2: Regional Development Strategy

Local Planning Authorities, in their development plans and other agencies and developers in their plans, policies and programmes, should consider the needs of the whole of their area and the best opportunities to promote more sustainable patterns of development, in accordance with the vision, aims and principles of development set out in section 2, taking into account the following strategic guidance:

- the 11 PUAs identified in this RPG offer the best opportunity for accommodating the majority of development in the most sustainable way. The aim should be to concentrate most development at the PUAs;
- development should take place primarily within the defined PUAs. Where this is not possible, development should be in the form of planned urban extensions to the PUA in sustainable locations with good access to the urban area by public transport, cycle and foot;
- other designated centres for growth can provide for sustainable and balanced growth to meet other identified sub-regional growth. The aim in designating towns as centres for growth should be to maintain and enhance the range of employment, housing and other facilities in areas of the region beyond the direct influence of the 11 PUAs and to reduce the need to travel. The level of growth to be accommodated in these centres, however, must be considered in relation to their function and not provide for growth that can be accommodated at the PUAs;
- new settlements should be considered and be identified in structure plans only where they are clearly more sustainable than meeting development needs in PUAs, or urban extensions to PUAs, or by the designation of other centres for growth;
- outside the PUAs and other designated centres for growth towns should be designated to act as local service centres for the wider rural areas of the region, other small towns and villages in rural areas should provide for local needs;
- policies should also resist the continuing substantial planned expansion of residential development of small dormitory towns within easy commuting distance of the PUAs that has occurred

historically.

#### Policy SS 4: Green Belt

Green Belts in the region should continue to fulfil the purposes set out in PPG2. As a key element of the future planning of the region, local authorities when preparing their development plans should:

- critically review the Green Belt to examine whether boundary alterations are needed to allow for long term sustainable development needs;
- remove land from the Green Belt for development if, on balance, this would provide the most sustainable solution for accommodating future development requirements;
- include additional land within the Green Belt where clearly necessary for the purposes set out in PPG2.

3.25 Bath is an important regional centre. It has a vibrant economy including tourism and fulfils an important role as a business, cultural and shopping centre. The entire city is designated as a World Heritage Site. It is surrounded by Green Belt and, largely, by the Cotswolds AONB.

3.26 A balance needs to be struck between preserving and enhancing the city's unique architectural, historic and landscape quality and encouraging and accommodating sustainable development. Bath is a living city, not a museum. If past unsustainable commuting trends are to be reversed, it is essential that increased opportunities be identified to provide adequate residential development at the PUA. In this area of national and international importance, optimum use needs to be made of any opportunities, including the reassessment of existing sites allocated for other uses, for residential and mixed use development. These will help to achieve wider urban renaissance objectives and ensure that a high quality of design and living continues into the future. It will also be important to maintain a broad economic base and identify an adequate range and supply of employment sites. Car-based traffic detracts from the unique environment and needs to be reduced.

#### Policy SS9: Bath

The local authority, developers, infrastructure and transport providers and other agencies should work together to achieve the following for Bath:

- ensure that Bath's unique environment is conserved and enhanced;
- encourage development for housing within the city where it can be achieved without damage to environment quality;
- recognise the need for economic development that enhances its role as a centre for business, cultural activities, retailing and tourism;
- give a high sub-regional priority to new public transport initiatives and other measures to reduce road traffic and congestion within the city, including that arising from road traffic between the M4 and the South;
- review the Green Belt in accordance with Policy SS 4.

A review of the Green Belt was carried at Bath as part of RSS 10 preparation in 2005, and was subject to independent examination in 2007. The conclusions of that review and examination led to the publication of the South West EiP Panel Report Dec 2007. Whether the Regional Spatial Strategy, RSS 10, is adopted or not and taking into account the Government's intention to scrap Regional Planning, the evidence gathered as part of Green Belt Review at the Inquiry is still material to the examination of strategic planning at the Core Strategy level. The Panel Inspector concluded that overall, exceptional circumstances existed at Bath to justify alteration of the Green Belt (4.0.32). The process that led to the identification of the broad locations for alteration of the Green Belt was sound and that such alteration would not threaten the main purposes of the Bristol Bath Green Belt (4.034-36). The Secretary of State agreed with the broad conclusions of the Panel and confirmed the location at Odd Down as an area of search for the New Neighbourhood.

As part of the CS process, the Council carried out additional review work of the Green Belt surrounding Bath as set out in the CSSO and supporting publications. These will be referred to as evidence to demonstrate further public consultation on review of the Green Belt. HFT made representations in support of the potential alteration to the Green Belt to accommodate the New Neighbourhood, CSSO Part 2 Sect 4. In addition the representations included comparative analysis of the Green Belt at two alternative locations on the edge of Bath. Those representations shall be used as further evidence to

justify the alteration of the Green Belt at Odd Down.

HFT also proposed extending the boundary of the Green Belt beyond that originally proposed by the Council, to include a number of adjoining, brown field areas, including the former Fullers Earth Works site. The reasons for these additional areas to be excluded from the Green belt are set out in CSSO Part 2 Sect 4.8 and in Appendix 4.

Finally, the detailed boundaries of the revised Green Belt are assessed to determine whether they are more or less likely to be permanent and provide an adequate buffer to the edge of the City including capacity for Green infrastructure, CSSO Part 2 Sect 4.7.

**Change sought to make sound:** Policy CP 8 will be amended by the insertion of the following words ' which will be amended to accommodate the New Neighbourhood at Odd Down' after Proposals Map at the end of the 2nd sentence.

The boundary of the Green Belt will be altered to accommodate the New Neighbourhood and the Proposals Map will be amended to show the new boundaries of the Green Belt as set out below.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 277\4 S

**Respondent:** Ashtenne Industrial Fund Limited Partnership

**Representation** Policy CP8 – Green Belt

**(soundness):**

Ashtenne supports the protection of the existing Green Belt extent, instead focusing development on existing brownfield opportunities to prevent urban sprawl and to protect the integrity of the World Heritage Site.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 280\7 S

**Respondent:** Scott Brownrigg

**Representation** Policy CP8 Green Belt, page 120

**(soundness):** We support the continued protection under national guidelines of the Green Belt which is an essential and integral part of the setting of the City which is a World Heritage Site.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 283\7

**Respondent:** Prior Park College and Paragon School

**Representation** Policy CP8 Green Belt

**(soundness):** It is identified that the general extent of the Green belt is identified on the Core Strategy Key Diagram. The College and Paragon School are concerned that the diagram does not identify Prior Park Campus as a major development site within the Green Belt and is therefore no consistent with current status of the site. This will compromise future reinvestment into the facility and ability for the College to manage and maintained the suite of listed buildings across the site. It is noted that the supporting text identifies that 'The Existing Buildings within the Green Belt' SPD will continue to guide decisions on proposals within the Green Belt. This is misleading, as the SPD is actually Existing Dwellings in the Green Belt, and does not set the context for other facilities such as Prior Park College and Paragon School.

Whilst the College notes that Policy GB.3 'Major Existing Developed Sites' is to be saved until replaced through the Bath LDF, we are concerned that a lack of reference to the continued role of the College or any identification of the site and its important role in the Core Strategy could lead to it being overlooked. This would place a considerable restriction on the ability for the College to continue its programme of investment. On this basis, the College seeks some form of recognition of both its role, and the future strategic designation attached to it within the Green Belt. Secondly, the College would seek the designation of the Paragon School site as a new major developed site in the Green Belt to reflect its current status and to enable the school to maintain and improve the education offer from the site through the plan period.

**Change sought to** Summary

**make sound:** Prior Park College and Paragon School are very keen to protect its ability to re-invest and enhance the high standard of facilities currently offered by the College and the School. To achieve this, the Council needs to recognise the key role of the establishment and to plan for its enhancement by continuing the College's designation as a major site within the Green Belt. If this designation is lost then the College will experience significant barriers to continue the ongoing programme of investment.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 286\8

**Respondent:** Horseworld

**Representation** The Core Strategy is unsound because the failure to make requisite changes to the Green Belt, linked  
**(soundness):** with the flawed spatial strategy (Policy DW1) this means that BANES is failing to deliver the required amount of housing to meet the needs of its population.

The emerging RSS recognised the need for change to the Green Belt at Whitchurch to provide a sustainable supply of housing for the future of BANES. The Green Belt boundary needs to be amended to provide a credible spatial strategy in terms of housing delivery - refer to other Horseworld Representations for justification of this approach. Policy CP8 is unsound because it does not allow for sufficient flexibility in the future delivery of new homes.

**Change sought to** Policy CP8 and the Core Strategy Key Diagram should be amended to include changes to the extent of  
**make sound:** the Green Belt at Whitchurch to allow for the provision of an urban extension to provide additional housing numbers required by the District.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 292\16

**Respondent:** Bath Avon River Corridor Group

**Representation** Policy CP8 p120 Whilst the continuing protection of the Green Belt when so much brownfield land is in  
**(soundness):** need of better utilisation is understandable, there are very real risks that pressure for high urban densities and no public open space will mean the river corridor underachieves that transformation that is desired. A city aspiring to stand comparison with Oxford and Cambridge (also within the top UK10) needs to recognise the qualitative aspects of their green space. By making the Green Belt boundary a sine qua non now, optimising the new economy of the city is being given second place – in fact with housing being the default position, it has been given 3rd place in strategic importance.

**Change sought to**  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 300\4

**Respondent:** Somer Housing

**Representation** Policy CP8 – Green Belt

**(soundness):** 6.4 In line with our earlier recommendations regarding increasing the housing provision, this policy needs to be completely reconsidered and rewritten. In order to meet housing demand, to provide the overwhelming need for affordable housing for BANES and to meet the Council's objectives for economic growth a higher housing provision is required. The SHLAA concludes that only 11,000 dwellings can be provided within the built up settlements of BANES and our proposed target range is well above this. Release of Green Belt and greenfield land will therefore be required.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 301\6

**Respondent:** South West RP Planning Consortium

**Representation** Policy CP8 – Green Belt

**(soundness):** We strongly urge the Council to rethink its Green Belt policy and release land for housing to meet the overwhelming need for housing. The first priority should be the reinstatement of the urban extension to South Bristol given the huge pressure from housing created by the growth of Bristol and the underprovision across the sub-region. Policy 6d Affordable Housing, mix of housing and Gypsies & Travellers

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 310\4 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.

4. That said, we believe there should be a flexible approach to the Green Belt. Of course we do not seek its total destruction, far from it, but we do believe that beneficial development should not be restricted by an overly tight interpretation.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 322\1 S

**Respondent:** Bath Spa University

**Representation** We act on behalf of Bath Spa University and hereby make a formal representation in support of Policy

**(soundness):** B1 - Spatial Strategy, which sets out the strategy to 'enable the provision for additional on-campus student bed spaces, enabling growth in the overall number of students and shrinkage of the private lettings market alongside on campus and in-city teaching and research space'.

Paragraph 12 of page 29 states that 'the development of the University of Bath and Bath Spa University

requires strategic policy direction in order to secure the future of each institution, and to ensure that the student population does not continue to drive the student lettings market to the detriment of the normal private housing and existing communities'.

In addition, to the above Objective 3 page 16, states that the Council's Economic Development Strategy seeks to stimulate a more productive, competitive and diversified economy across the District where knowledge based sectors are attracted to the area and continues to contribute to the local economy by capitalising on innovation opportunities arising from higher education institutions, improving educational facilities to help provide the skills that support knowledge based sectors and retaining those skills and talents in the city and wider area.

Policy B1 enables the provision of additional on-campus student bed spaces which will enable the overall growth in the overall number of students and shrinkage of the private lettings market.

Overall, there are overwhelming reasons for the provision for additional on-campus bed spaces and we therefore concur with this policy.

Bath Spa University is keen to provide further bed spaces for students at Newton Park with a target of approximately 1000 bed spaces, from 394 existing. This is on the assumption of no growth in overall student numbers at the university over the foreseeable future which will therefore further ease the pressure on private housing stock in Bath.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 322\3 S

**Respondent:** Bath Spa University

**Representation** We act on behalf of Bath Spa University and hereby make a formal representation to Policy CP8.

**(soundness):**

Policy CP8 conforms with national policy which also states that the general extent and detailed boundaries of the Green Belt should be altered only exceptionally.

Part of Newton Park Campus is adopted as a Major Existing Development Site in the Green Belt within the existing Local Plan.

Elements of the built form of the Newton Park Campus already stray outside of the existing MEDS into the Green Belt such as car parks, grounds maintenance facilities, recycling facilities, walled garden area and outbuildings etc and therefore the site should be classed as previously developed land.

The current boundary of the MEDS allocation is very tight to the existing built environment at the University and therefore, acts as a constraint to the implementation of Draft Core Strategy Policy B1 and B8 and requires amendment in order to cater for the Phase 2 and Phase 3 (part) proposals of the Newton Park Campus Masterplan.

In terms of the policy context of Policy CP8 we believe that an exception exists to have the MEDS extended. Policy B5 makes provision for the redevelopment and intensification of the Newton Park Campus to provide additional study bedrooms and academic space. It continues that proposals should seek to optimise opportunities within the MEDS and in accordance with Policy GB.3 of B&NES Local Plan before seeking to justify very special circumstances.

The redevelopment and intensification of the Newton Park Campus within Phase I has optimised the opportunity of placing the built form within the MEDS allocation and therefore in order to cater for Phase 2 and achieve further growth of the campus proposed in the Core Strategy and evidence in the Masterplan it will be necessary to extend the MEDS boundary as shown on the attached plan (Figure 1).



**Change sought to make sound:** The revision of the MEDS site boundary (as shown on the attached plan, Figure 1) to enable the Phase 2 and Phase 3 (part) development only seeks to extend the MEDS site allocation the minimum necessary to accommodate the proposed development and does not seek to encroach more than is necessary on the Green Belt, nor outside of previously developed land. Indeed, the Phase 2 proposed scheme allows for some built development in the form of existing car parking to be re-instated into the landscape.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 325\4

**Respondent:** Taylor Wimpey UK Ltd.

**Representation (soundness):** POLICY CP8 STATES THAT THE GREEN BELT WILL BE PROTECTED FROM INAPPROPRIATE DEVELOPMENT IN ACCORDANCE WITH NATIONAL PLANNING POLICY. TABLE 8 (PAGE 121) STATES THAT THE PURPOSES OF INCLUDING LAND IN THE GREEN BELT IN BRISTOL / BATH INCLUDES "TO PRESERVE THE INDIVIDUAL CHARACTER, IDENTITY AND SETTING OF KEYNSHAM" (POINT 6). MINDFUL OF POLICY CP8 THE COUNCIL PROPOSES TO IMPINGE UPON GREEN BELT LAND TO THE SOUTH OF KEYNSHAM BY IDENTIFYING THE PRIMARY MEANS OF ACCESSING THE LOCAL PLAN HOUSING ALLOCATION 'K2B' FROM CHARLTON ROAD AND FORMING AN ACCESS ROAD ACROSS THE WOODLAND TRUST LAND WHICH IS WITHIN THE GREEN BELT DESIGNATION ('SHLAA REPORT OF FINDINGS' - DECEMBER 2010).

NO HIGHWAY JUSTIFICATION OR EVIDENCE BASE APPEARS TO HAVE BEEN PROVIDED BY THE COUNCIL REGARDING THE REVISED MEANS OF ACCESS TO SITE K2B BEING ACROSS GREEN BELT LAND MINDFUL THAT THE LOCAL PLAN ALLOCATION OF THIS SITE IDENTIFIES ACCESS FROM PARK ROAD WHICH HAS NO DETRIMENTAL IMPACT UPON KEYNSHAM'S GREEN BELT. THE TRANSPORT ASSESSMENT SUBMITTED IN RESPECT OF PLANNING APPLICATION 09/04351/FUL RELATING TO SITE K2B IDENTIFIES THAT PRIMARY ACCESS TO THIS SITE CAN BE SATISFACTORILY DELIVERED FROM PARK ROAD.

THE PROPOSED PRIMARY MEANS OF VEHICULAR ACCESS TO SITE K2B ACROSS GREEN BELT LAND CONFLICTS WITH POLICY CP8 AND IS NOT SUPPORTED BY A ROBUST EVIDENCE BASE OR CONSISTENT WITH NATIONAL GREEN BELT PLANNING POLICY. IT IS QUERIED WHETHER THIS ACCESS, AND HENCE SITE K2B, IS THEREFORE DELIVERABLE. (REFER TO THE SEPARATE NOTE ON THE 'SHLAA – REPORT OF FINDINGS APPENDIX 1C – KEYNSHAM SITE ASSESSMENTS – DECEMBER 2010)

**Change sought to make sound:** JUSTIFICATION FOR PROPOSING THE MEANS OF ACCESS TO SITE K2B ACROSS GREEN BELT LAND HAS NOT BEEN PROVIDED BY THE COUNCIL. THE MEANS OF ACCESS TO THIS SITE SHOULD THEREFORE BE SHOWN FROM PARK ROAD AND THE COUNCIL'S APPROACH TO ACCESSING SITE K2B SHOULD REVERT TO THAT IDENTIFIED WITHIN POLICY GDS.1 K2 OF THE ADOPTED LOCAL PLAN.

EVIDENCE SHOULD BE PROVIDED TO SHOW THAT THE WOODLAND TRUST IS SUPPORTIVE OF VEHICULAR ACCESS TO SITE K2B BEING ACROSS ITS WOODLAND WHICH FORMS PART OF KEYNSHAM'S GREEN BELT.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 326\3 S

**Respondent:** Patricia Pick

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 327\3 S

**Respondent:** Susan Thatcher

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 328\3 S

**Respondent:** David Reeve

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 329\3 S

**Respondent:** Barbara Reeve

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 330\3 S

**Respondent:** Norman Bellworthy

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 331\3 S

**Respondent:** Jean Bellworthy

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 332\3 S

**Respondent:** Nicholas Owen

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 333\3 S

**Respondent:** Sandra Webb

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 334\3 S

**Respondent:** T. Davies

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 335\3 S

**Respondent:** Jennifer Davies

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 336\3 S

**Respondent:** Muriel Gibbs

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 337\3 S

**Respondent:** R. Studley

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 338\3 S

**Respondent:** A.J. Studley

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 339\3 S

**Respondent:** Susan Maggs

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 340\3 S

**Respondent:** Charlotte Maggs

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 341\3 S

**Respondent:** Terence Wittner

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 342\3 S

**Respondent:** Jason Stone

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 343\3 S

**Respondent:** D. Peacey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 344\3 S

**Respondent:** M. Peacey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 345\3 S

**Respondent:** Beatrix Vasarhelyi

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 346\3 S

**Respondent:** J. Keep

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 347\3 S

**Respondent:** James Lawson

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 348\3 S

**Respondent:** E. Webb

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 349\3 S

**Respondent:** Janet Webb

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 350\3 S

**Respondent:** Susan Palmer

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 351\3 S

**Respondent:** R. Palmer

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 352\3 S

**Respondent:** Richard Hall

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 353\3 S

**Respondent:** Angela Hall

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 354\3 S

**Respondent:** R Penney

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 355\3 S

**Respondent:** P Penney

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**



**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 356\3 S

**Respondent:** Peter Goodwin

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 357\3 S

**Respondent:** Anita Goodwin

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 358\3 S

**Respondent:** Clive Powell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 359\3 S

**Respondent:** J.E. Powell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 360\3 S

**Respondent:** S. Evans

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 361\3 S

**Respondent:** Sylvia Cox

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 362\3 S

**Respondent:** Mervyn Cox

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 363\3 S

**Respondent:** James Thrower

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 364\3 S

**Respondent:** Joyce Thrower

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 365\3 S

**Respondent:** N. Farrance

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 366\3 S

**Respondent:** Diana Farrance

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 367\3 S

**Respondent:** Trevor Davis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 368\3 S

**Respondent:** Sheila Davis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 369\3 S

**Respondent:** Anne Griffin

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 370\3 S

**Respondent:** David Whelan

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 371\3 S

**Respondent:** June Carter

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 373\3 S

**Respondent:** Ann Marshall

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 374\3 S

**Respondent:** Graham Carter

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 375\3 S

**Respondent:** F. Box

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 376\3 S

**Respondent:** J. Edwards

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 377\3 S

**Respondent:** Judith Edwards

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 378\3 S

**Respondent:** Lilian Hayward

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 379\3 S

**Respondent:** Michael Searle

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 380\3 S

**Respondent:** Molly Ford

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 381\3 S

**Respondent:** M.A. Ford

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 382\3 S

**Respondent:** Dennis Gould

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 383\3 S

**Respondent:** Pamela Gould

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 385\3 S

**Respondent:** Desmond Westlake

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 386\3 S

**Respondent:** Tony Smith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 387\3 S

**Respondent:** Wendy Smith

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 388\3 S

**Respondent:** Natasha Morgan

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 389\3 S

**Respondent:** Nathan Morgan

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 390\3 S

**Respondent:** Kim Thomas

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 391\3 S

**Respondent:** M.Thomas

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 392\3 S

**Respondent:** S. Jewell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 393\3 S

**Respondent:** V. Perry

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 394\3 S

**Respondent:** Keith Perry

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 395\3 S

**Respondent:** P.G.Cook

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 402\3 S

**Respondent:** L Fennelly

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 403\3 S

**Respondent:** S Jewell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 404\3 S

**Respondent:** S Fennelly

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 405\3 S

**Respondent:** Richard Sweet

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 406\3 S

**Respondent:** Janet Sweet

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 407\3 S

**Respondent:** Charles Luker

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 408\3 S

**Respondent:** P Walsh

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 409\3 S

**Respondent:** Angela Sims

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 410\3 S

**Respondent:** Bernard Sims

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 411\3 S

**Respondent:** Caroline Walsh

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 412\3 S

**Respondent:** Jason Clark

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 413\3 S

**Respondent:** Jessica Clark

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 414\3 S

**Respondent:** D J Clark

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 415\3 S

**Respondent:** B Clark

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 416\3 S

**Respondent:** James O'Connell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 417\3 S

**Respondent:** Penny O'Connell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 418\3 S

**Respondent:** J H Sobey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 419\3 S

**Respondent:** J Dalton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 420\3 S

**Respondent:** Alan Dalton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 421\3 S

**Respondent:** Lisa Smith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 422\3 S

**Respondent:** A R Smith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 423\3 S

**Respondent:** Kevin Purnell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 424\3 S

**Respondent:** K Purnell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 425\3 S

**Respondent:** J Purnell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 426\3 S

**Respondent:** Harry Purnell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 427\3 S

**Respondent:** Matthew Wilkes

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 428\3 S

**Respondent:** Nathan Wilkes

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 429\3 S

**Respondent:** Adrian Wilkes

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 430\3 S

**Respondent:** Susan Wilkes

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 431\3 S

**Respondent:** Cherrí Leando

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 432\3 S

**Respondent:** J Leando

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 433\3 S

**Respondent:** Selena Norfolk

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 434\3 S

**Respondent:** Elizabeth Cox

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 435\3 S

**Respondent:** Rachel Davis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 436\3 S

**Respondent:** Trevor Hicks

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 437\3 S

**Respondent:** Michelle Bane

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 438\3 S

**Respondent:** Colin Willis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 439\3 S

**Respondent:** A M Willis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 440\3 S

**Respondent:** Carol Carter

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 441\3 S

**Respondent:** Ruth Wilmot

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 442\3 S

**Respondent:** Royston Wilmot

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 443\3 S

**Respondent:** Marianne Britten

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 444\3 S

**Respondent:** Rosemary Gullis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 445\3 S

**Respondent:** L S Carter

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 446\3 S

**Respondent:** Alfred Leonard

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 447\3 S

**Respondent:** June Leonard

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 448\3 S

**Respondent:** Jennifer Barker

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 449\3 S

**Respondent:** Acker Bilk

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 450\3 S

**Respondent:** Paul Bishop

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 451\3 S

**Respondent:** Mrs G Bishop

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 452\3 S

**Respondent:** Mr G Bishop

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 453\3 S

**Respondent:** Antony Godfrey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 454\3 S

**Respondent:** Tanya Mabbs-Godfrey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 455\3 S

**Respondent:** Steve Barker

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 456\3 S

**Respondent:** Jean Bilk

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 457\3 S

**Respondent:** Serena Bishop

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 458\3 S

**Respondent:** Nathan Mabbs-Godfrey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 459\3 S

**Respondent:** Mrs N. R. Hill

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 460\3 S

**Respondent:** J Green

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 461\3 S

**Respondent:** David Green

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 462\3 S

**Respondent:** Dennis Baber

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 463\3 S

**Respondent:** Jane Barber



**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 464\3 S

**Respondent:** Louisa Baber

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 465\3 S

**Respondent:** Robert Whiting

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 466\3 S

**Respondent:** W. J. Lacey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 467\3 S

**Respondent:** K. J.. Lacey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 468\3 S

**Respondent:** Barbara Clarke

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 469\3 S

**Respondent:** B Davis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 470\3 S

**Respondent:** Sylvia Davis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 471\3 S

**Respondent:** Geoff Carpenter

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 472\3 S

**Respondent:** Rachael Carpenter

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 473\3 S

**Respondent:** J Carpenter

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 474\3 S

**Respondent:** Gerald Smith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 475\3 S

**Respondent:** Susan Smith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 476\3 S

**Respondent:** D Milkins

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 477\3 S

**Respondent:** R Milkins

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 478\3 S

**Respondent:** Deborah Fletcher

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 479\3 S

**Respondent:** Andrew Fletcher

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 480\3 S

**Respondent:** Olive Jones

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 481\3 S

**Respondent:** Julie Filer

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 482\3 S

**Respondent:** Tony Filer

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 483\3 S

**Respondent:** Margaret Foxwell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 484\3 S

**Respondent:** David E. Foxwell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 485\3 S

**Respondent:** Brian Worlock

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 486\3 S

**Respondent:** Janet Worlock

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 487\3 S

**Respondent:** Allan Price

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 488\3 S

**Respondent:** Joyce Price

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 489\3 S

**Respondent:** A Bates

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 490\3 S

**Respondent:** J Bates

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 491\3 S

**Respondent:** E. P. Willington

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 492\3 S

**Respondent:** Mrs P. C. Tichborne

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 493\3 S

**Respondent:** F. G. Tichborne

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 494\3 S

**Respondent:** P Reynolds

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 495\3 S

**Respondent:** P Reynolds

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 496\3 S

**Respondent:** Richard Harrison

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".



Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 497\3 S

**Respondent:** Linda Harrison

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 498\3 S

**Respondent:** Mr David Lewis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 499\3 S

**Respondent:** Mrs Tracey Lewis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 500\3 S

**Respondent:** Colin Taylor

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 501\3 S

**Respondent:** Cheryl Taylor

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 502\3 S

**Respondent:** Patience Campbell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 503\3 S

**Respondent:** Michael Campbell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 504\3 S

**Respondent:** Jeremy Cox

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 505\3 S

**Respondent:** Hilary Cox

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 506\3 S

**Respondent:** Heather Davis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 507\3 S

**Respondent:** John Davis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 508\3 S

**Respondent:** Olivia Norfolk

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 509\3 S

**Respondent:** Andrew Ford

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 510\3 S

**Respondent:** Allan Peters

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 511\3 S

**Respondent:** James Peters

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 512\3 S

**Respondent:** J. Roach

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 513\3 S

**Respondent:** Peter Roach

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 514\3 S

**Respondent:** A Bishop

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 515\3 S

**Respondent:** T. E. Stokes

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 516\3 S

**Respondent:** T. J. Stokes

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 517\3 S

**Respondent:** W. J. Rose

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 518\3 S

**Respondent:** Tony Griffith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 519\3 S

**Respondent:** Judith Griffith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 520\3 S

**Respondent:** The Rev'd John W. Masding

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 521\3 S

**Respondent:** Margaret Masding

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 522\3 S

**Respondent:** J. G. Slade

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 523\3 S

**Respondent:** D. H. Slade

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 524\3 S

**Respondent:** Mrs B. J. Osborne

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 525\3 S

**Respondent:** Marina Norris

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 526\3 S

**Respondent:** Janet Russ

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 527\3 S

**Respondent:** Michael Russ

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 528\3 S

**Respondent:** Neil Davies

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 529\3 S

**Respondent:** Miguel Humblet

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.



relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 534\3 S

**Respondent:** Carolyn Brennan

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 535\3 S

**Respondent:** Melanie Crane

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 537\3 S

**Respondent:** Jonathan Crane

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 538\3 S

**Respondent:** F. Barton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 539\3 S

**Respondent:** K. E. Barton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 540\3 S

**Respondent:** Mrs B Jones

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 541\3 S

**Respondent:** Mr G Jones

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 542\3 S

**Respondent:** M. Norman

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 543\3 S

**Respondent:** Mary Clark

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 544\3 S

**Respondent:** T. Clark

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 545\3 S

**Respondent:** E. O'Regan

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 546\3 S

**Respondent:** G. O'Regan

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 547\3 S

**Respondent:** Sally Paul

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 548\3 S

**Respondent:** Cllr Peter Edwards

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 549\3 S

**Respondent:** Ann Edwards

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 550\3 S

**Respondent:** D. L. Pearce

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 551\3 S

**Respondent:** M. L. Pearce

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 552\3 S

**Respondent:** Peter Smith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 553\3 S

**Respondent:** J. R. Smith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 554\3 S

**Respondent:** J. Payne

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 555\3 S

**Respondent:** Kim Payne

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 556\3 S

**Respondent:** Christine Saunders

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 557\3 S

**Respondent:** Barrie Saunders

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 558\3 S

**Respondent:** S J E Thomas

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 559\3 S

**Respondent:** Mary Thomas

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 560\3 S

**Respondent:** Denise Rhodes

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 561\3 S

**Respondent:** Philip Young

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 562\3 S

**Respondent:** C I Young

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 563\3 S

**Respondent:** P A Hill

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 564\3 S

**Respondent:** Janet Head

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 565\3 S

**Respondent:** N J Head

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 566\3 S

**Respondent:** Jennifer Skuse

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 567\3 S

**Respondent:** Anthony Skuse

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.



**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 568\3 S

**Respondent:** S D Matthews

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 569\3 S

**Respondent:** J Nethercott

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 570\3 S

**Respondent:** Joyce Williams

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 571\3 S

**Respondent:** Brian Ogborne

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 572\3 S

**Respondent:** Patricia Ogborne

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 573\3 S

**Respondent:** Kirstie Towe

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 574\3 S

**Respondent:** Nicholas Towe

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 575\3 S

**Respondent:** Paul Hammerenn

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 576\3 S

**Respondent:** Ann Summers

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 577\3 S

**Respondent:** Martyn Summers

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 578\3 S

**Respondent:** B L Hauser

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 579\3 S

**Respondent:** Mary Hauser

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 580\3 S

**Respondent:** Louise Western

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 581\3 S

**Respondent:** Craig Western

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 582\3 S

**Respondent:** R Tucker

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 583\3 S

**Respondent:** A Tucker

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 584\3 S

**Respondent:** J Bethell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 585\3 S

**Respondent:** A Bethell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 586\3 S

**Respondent:** Martin Parry

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 587\3 S

**Respondent:** Susan Parry

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 588\3 S

**Respondent:** Mrs N W Wiggins

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 589\3 S

**Respondent:** Ruth Osborne

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 590\3 S

**Respondent:** L G Osborne

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 591\3 S

**Respondent:** S Gunter-Phillips

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 592\3 S

**Respondent:** C Gunter-Phillips

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 593\3 S

**Respondent:** B Webb

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 594\3 S

**Respondent:** Keith Webb

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 595\3 S

**Respondent:** David Bennett

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 596\3 S

**Respondent:** M Bennett

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 597\3 S

**Respondent:** J P Howard

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 598\3 S

**Respondent:** P B Howard

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 599\3 S

**Respondent:** Avril Backwell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 600\3 S

**Respondent:** Alan Backwell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**



**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 601\3 S

**Respondent:** Janet Wilmshurst

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 602\3 S

**Respondent:** L J Wilmshurst

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 603\3 S

**Respondent:** Margaret Stone

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 604\3 S

**Respondent:** Raymond Stone

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 605\3 S

**Respondent:** J A Phillips

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 606\3 S

**Respondent:** D Phillips

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 607\3 S

**Respondent:** L Tucker

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 608\3 S

**Respondent:** Jason Stevens

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 609\3 S

**Respondent:** Tracey Stevens

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 610\3 S

**Respondent:** Lorraine Coombes

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 611\3 S

**Respondent:** M A Greatbanks

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 612\3 S

**Respondent:** A E F Quinn

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 613\3 S

**Respondent:** L M Quinn

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 614\3 S

**Respondent:** M Subow

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 615\3 S

**Respondent:** Ceri Giles

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 616\3 S

**Respondent:** James Giles

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 617\3 S

**Respondent:** Darren Broomfield

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 618\3 S

**Respondent:** H C Broomfield

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 619\3 S

**Respondent:** Audrey Tovey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 620\3 S

**Respondent:** H A Greatbanks

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 621\3 S

**Respondent:** I P Greatbanks

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 622\3 S

**Respondent:** B J Gitsham

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 623\3 S

**Respondent:** C M Gitsham

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 624\3 S

**Respondent:** Audrey Cowley

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 625\3 S

**Respondent:** Audrey Ashton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 626\3 S

**Respondent:** S P Spencer

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 627\3 S

**Respondent:** Jennifer Eaton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 628\3 S

**Respondent:** Richard Eaton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 629\3 S

**Respondent:** Richard Woodbridge

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 630\3 S

**Respondent:** Pamela Woodbridge

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 631\3 S

**Respondent:** R G Miles

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 632\3 S

**Respondent:** Ena Miles

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 633\3 S

**Respondent:** Jean Francis

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 634\3 S

**Respondent:** B Spragg

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 635\3 S

**Respondent:** David Ballinger

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 636\3 S

**Respondent:** Rosemary Ballinger

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 637\3 S

**Respondent:** D Finnemore

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 638\3 S

**Respondent:** Judith Finnemore

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 639\3 S

**Respondent:** C Carter

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 640\3 S

**Respondent:** F J Carter

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 641\3 S

**Respondent:** Mrs P J Melrose

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 642\3 S

**Respondent:** Caroline Stewart

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 643\3 S

**Respondent:** Janet Ogilvie

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 644\3 S

**Respondent:** S Rawlings

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 645\3 S

**Respondent:** Lizz Rawlings

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 646\3 S

**Respondent:** Roger Webster

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 647\3 S

**Respondent:** M Webster

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 648\3 S

**Respondent:** Peter Glirton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 649\3 S

**Respondent:** Gloria Glirton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 650\3 S

**Respondent:** V J Tattersall

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 651\3 S

**Respondent:** G A Tattersall

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 652\3 S

**Respondent:** Mrs J S Gwyther

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 653\3 S

**Respondent:** David Gwyther

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 654\3 S

**Respondent:** Mark Crane

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 655\3 S

**Respondent:** Sylvia Clements

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 656\3 S

**Respondent:** Julie Tooze

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 657\3 S

**Respondent:** Andrew Tooze

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 658\3 S

**Respondent:** Evelyn Read

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 659\3 S

**Respondent:** Gareth Read

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 660\3 S

**Respondent:** Jean Miles

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 661\3 S

**Respondent:** S Hucker

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 662\3 S

**Respondent:** A Hucker

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 663\3 S

**Respondent:** Mrs J M Jewell

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 664\3 S

**Respondent:** G M Daniel

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 665\3 S

**Respondent:** Nicholas Mansfield

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 667\3 S

**Respondent:** Jean Mansfield

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 668\3 S

**Respondent:** J Hampton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 669\3 S

**Respondent:** G Knighton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 670\3 S

**Respondent:** M Knighton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 671\3 S

**Respondent:** Paul Smith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 672\3 S

**Respondent:** Sandie-Jay Smith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 673\3 S

**Respondent:** Mrs N Smith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 674\3 S

**Respondent:** Shane Smith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 675\3 S

**Respondent:** Rebecca Demytruk

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 676\3 S

**Respondent:** Justin Jones

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 677\3 S

**Respondent:** M J Squire

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 678\3 S

**Respondent:** Carol Squire

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 679\3 S

**Respondent:** P Hieron

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 680\3 S

**Respondent:** Rosemary Hieron

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 681\3 S

**Respondent:** J Stout

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 682\3 S

**Respondent:** Keith Stout

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 683\3 S

**Respondent:** Rosemary Davis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 684\3 S

**Respondent:** David Spear

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 685\3 S

**Respondent:** Bernard Coles

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 686\3 S

**Respondent:** Gillian Coles

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 687\3 S

**Respondent:** Harold Gully

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 688\3 S

**Respondent:** J E A Gully

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 689\3 S

**Respondent:** Lionel Webb

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 690\3 S

**Respondent:** Ann Webb

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 691\3 S

**Respondent:** Mrs Bernice Parsons

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 692\3 S

**Respondent:** Mr Keith Parsons

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 693\3 S

**Respondent:** S Gunton

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 694\3 S

**Respondent:** Mrs J Gunton

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 695\3 S

**Respondent:** T K Banks

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 696\3 S

**Respondent:** S Banks

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 697\3 S

**Respondent:** Maureen Hawkins

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 698\3 S

**Respondent:** Roger Hawkins

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 699\3 S

**Respondent:** Angela Prescott

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 700\3 S

**Respondent:** Neil Prescott

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 701\3 S

**Respondent:** Lucinda Blurton



**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 702\3 S

**Respondent:** John Blurton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 703\3 S

**Respondent:** Mr R A Fricker

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 704\3 S

**Respondent:** Josephine Pike

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 705\3 S

**Respondent:** Derek Pike

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 706\3 S

**Respondent:** Brian Vowles

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 707\3 S

**Respondent:** Angela Vowles

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 708\3 S

**Respondent:** Peter Leavey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 709\3 S

**Respondent:** Mrs W D Green

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 710\3 S

**Respondent:** Mr M Green

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 711\3 S

**Respondent:** Mrs W D Green

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 712\3 S

**Respondent:** Julie Williams

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 713\3 S

**Respondent:** Michael Williams

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 714\3 S

**Respondent:** Mrs Y J Daniell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 715\3 S

**Respondent:** John Frape

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 716\3 S

**Respondent:** Janet Frape

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 717\3 S

**Respondent:** Terrence Gerrish

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 718\3 S

**Respondent:** June Gerrish

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 719\3 S

**Respondent:** Mr P R James

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 720\3 S

**Respondent:** R H Bamford

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 721\3 S

**Respondent:** Janet Harding

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 722\3 S

**Respondent:** Beverley Harding

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 723\3 S

**Respondent:** Shirley Britton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 724\3 S

**Respondent:** Walter Britton

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 725\3 S

**Respondent:** G Ridley

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 726\3 S

**Respondent:** M Ridley

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 727\3 S

**Respondent:** Patricia Martin

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 728\3 S

**Respondent:** Allan Martin

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 729\3 S

**Respondent:** Pearl Meredith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 730\3 S

**Respondent:** A T Broad

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 731\3 S

**Respondent:** B A Leach

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 732\3 S

**Respondent:** Mrs M J Thomas

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 733\3 S

**Respondent:** S W Thomas

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 734\3 S

**Respondent:** A Markey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".



Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 735\3 S

**Respondent:** Christopher Markey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 736\3 S

**Respondent:** G E Allward

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 737\3 S

**Respondent:** C J Allward

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 738\3 S

**Respondent:** T J Allward

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 739\3 S

**Respondent:** C Allward

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 740\3 S

**Respondent:** Paul Ollis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 741\3 S

**Respondent:** A Ollis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 742\3 S

**Respondent:** P Gardiner

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 743\3 S

**Respondent:** G R Gardiner

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 744\3 S

**Respondent:** G Foster

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 745\3 S

**Respondent:** A Francomb

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 746\3 S

**Respondent:** Mrs A J Francomb

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 747\3 S

**Respondent:** David Meredith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 748\3 S

**Respondent:** J Meredith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 749\3 S

**Respondent:** Gwendoline Hill

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 750\3 S

**Respondent:** A White

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 751\3 S

**Respondent:** John Winter

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 752\3 S

**Respondent:** Frank Evey

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 753\3 S

**Respondent:** M D Coleman

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 754\3 S

**Respondent:** J H Coleman

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 755\3 S

**Respondent:** Mrs P A Barrett

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 756\3 S

**Respondent:** Mr G A Barrett

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 757\3 S

**Respondent:** B E Rosenthal

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 758\3 S

**Respondent:** John Rosenthal

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 759\3 S

**Respondent:** Stephen Johnson

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 760\3 S

**Respondent:** Judith Johnson

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 761\3 S

**Respondent:** Frank Lewis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 762\3 S

**Respondent:** Margaret Lewis

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 763\3 S

**Respondent:** Leonard Wills

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 764\3 S

**Respondent:** Linda Wills

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 765\3 S

**Respondent:** Sharon Bryant

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 766\3 S

**Respondent:** Peter Bryant

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 767\3 S

**Respondent:** Gary Sweet

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.



relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 768\3 S

**Respondent:** Fiona Sweet

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 769\3 S

**Respondent:** Fiona Britten

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 770\3 S

**Respondent:** Lee Smith

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 771\3 S

**Respondent:** Vicki Ephgrave

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 772\3 S

**Respondent:** Paul Feltham

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 773\3 S

**Respondent:** Vicky Feltham

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 774\3 S

**Respondent:** Nancy Mathias

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 775\3 S

**Respondent:** Neal Mathias

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 776\3 S

**Respondent:** M D Shortman

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 777\3 S

**Respondent:** P D Shortman

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 778\3 S

**Respondent:** Bernard Coombs

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 779\3 S

**Respondent:** Beryl Coombs

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 780\3 S

**Respondent:** Jane Hewitt

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 781\3 S

**Respondent:** Martin Hewitt

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 782\3 S

**Respondent:** Margaret Barnes

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 783\3 S

**Respondent:** R Tippins

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 784\3 S

**Respondent:** Sherry Robins

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 785\3 S

**Respondent:** Rosemary Pond

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 786\3 S

**Respondent:** James Pond

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 787\3 S

**Respondent:** M J Parsons

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 788\3 S

**Respondent:** J A Parsons

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 789\3 S

**Respondent:** G Hall-Kenny

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 790\3 S

**Respondent:** Paul Moylett

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 791\3 S

**Respondent:** Mrs B Moylett

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 793\3 S

**Respondent:** Lorraine Davies

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness)**: also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 794\3 S

**Respondent:** Alison Davies

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 795\3 S

**Respondent:** Ruth Wear

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 796\3 S

**Respondent:** John Wear

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 797\3 S

**Respondent:** Sarah Sheenhan

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 798\3 S

**Respondent:** Kerry Sheenhan

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 799\3 S

**Respondent:** L M Johnson

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 800\3 S

**Respondent:** A L Johnson

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 801\3 S

**Respondent:** A Lindley

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.



**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 802\3 S

**Respondent:** G Lindley

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 803\3 S

**Respondent:** Alan York

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 804\3 S

**Respondent:** D D Lugiewicz-York

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 805\3 S

**Respondent:** A Cooper

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 806\3 S

**Respondent:** S Cooper

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 807\3 S

**Respondent:** J Blackwell

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 808\3 S

**Respondent:** Susan Rosolek

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 809\3 S

**Respondent:** Enrico Rosolek

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 810\3 S

**Respondent:** Paul Britten

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 811\3 S

**Respondent:** Jill Britten

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 812\3 S

**Respondent:** S Penfold

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 813\3 S

**Respondent:** John Lane

**Representation (soundness):** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must also be care taken that developers do not take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 814\3 S

**Respondent:** Angela Lane

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 815\3 S

**Respondent:** Cologero Santilippo

**Representation** Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must  
**(soundness):** also be care taken that developers do no take advantage of the "Community Right to Build".

Page 121, Policy CP8, Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 819\2 S

**Respondent:** Paulton Parish Council

**Representation** 6.61 states, "Green Belts are designated primarily to prevent urban sprawl"  
**(soundness):** So whilst Paulton is not within the green belt I believe that this policy is relevant in protecting the boundaries of the village and preventing connection with Hallowtrow, Midsomer Norton or Farrington Gurney.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Plan Reference: Paragraph 6.65**

**Reference:** 95\2

**Respondent:** The Coal Authority

**Representation** In response to the previous consultation on the Core Strategy in December 2009, The coal Authority  
**(soundness):** made the following comments:

"The proposed Core Policy on Safeguarding Minerals currently makes no mention of the definition of Mineral Safeguarding Areas (MSAs). As such, the Coal Authority considers that the Core Strategy currently fails to meet the requirements set out in paragraph 13 of MPS1, which requires MSAs to be defined in Local Development Documents.

As outlined above, there are significant coal resources within Bath and North East Somerset which are capable of extraction by surface mining techniques. The Coal Authority has provided the Council with the Surface Coal Resource Plan in November 2009 to show where these resources occur within the Plan area. The Surface Coal Resource Plan has been developed in conjunction with British Geological Survey

and surface mining operators for use within the planning process. It is therefore considered to represent the best available geological and minerals resource information for the area, as required by paragraph 32 of the MPS1 Practice Guide, and should form the evidence base for the definition of an MSA for coal.

Unless the issue of MSAs is addressed to some extent within the Core Strategy, the Coal Authority considers that there is a significant risk of the document being unsound in respect of the requirement for consistency with national policy. Indeed, the Coal Authority is likely to object to the Core Strategy on these grounds unless this issue is addressed within the Proposed Submission Draft of the document.

The Coal Authority therefore considers that the Core Strategy should acknowledge the presence of surface coal resources within the Bath and North East Somerset area. It should also contain a policy commitment to identifying an MSA for coal in order to ensure that this resource is not needlessly sterilised by non-mineral developments. The detailed boundary of the MSA (for which the evidence base should be the Surface Coal Resource Plan) should then be determined either within the Core Strategy or a subsequent Development Plan Document as the Council deems appropriate. However, if the latter option is preferred it may be appropriate to define the general extent of the coal resource area (along with any other relevant mineral resources) on the Key Diagram or another illustration in the Core Strategy.

Linked to the identification of MSAs, the Coal Authority also considers that the Core Strategy policy on Safeguarding Minerals should incorporate criteria to encourage the prior extraction of minerals in situations where it is necessary for non-mineral development to take place within MSAs. This is necessary in order to meet the requirements of paragraph 13 of MPS1 and avoid the unnecessary sterilisation of the nation's resource."

The Draft Core Strategy does not positively respond to these comments and still does not address the issue of mineral safeguarding as required by MPS1. As such The Coal Authority considers that the Core Strategy is UNSOUND.

It is noted that the Core Strategy in Paragraph 6.69 states: "Development proposals relating to minerals resources will continue to be considered within the context of national minerals planning policy and the saved minerals policies in the B&NES Local Plan until reviewed through the Placemaking Plan. Minerals Safeguarding Areas will be defined in the Placemaking Plan as will other minerals allocations and designations."

This proposed approach is at odds with the requirements of MPS1, the saved Local Plan Policy M.2 does not define Mineral Safeguarding Areas, it utilises the outdated approach of using old Mineral Consultation Areas. These areas also only cover small geographic areas and do not cover the full mineral resources that need to be safeguarded. As an example they do not in any way seek to safeguard the surface coal resource from unnecessary sterilisation as MPS1 requires. For the reasons set out above, the Coal Authority is of the firm view that, whilst it is inherently difficult to quantify the long term requirement for energy minerals such as coal, there will clearly remain a significant demand for indigenous coal supply both during and beyond the period of the Core Strategy and beyond.

#### Coal Mining Legacy

As you will be aware, the Bath and North East Somerset area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.

Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area – particularly where coal exists near to the surface – including existing residential areas. The new Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur.

The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning process in coalfield areas needs to take account of coal mining legacy issues. The principal source of guidance is PPG14, which despite its age still contains the science and best practice on how to safely treat unstable ground.

Within the Bath and North East Somerset area there are approximately 550 recorded mine entries. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure site allocations and other policies and programmes will not lead to future public safety hazards.

Although mining legacy occurs as a result of mineral workings, it is important that new development delivered through the Local Development Framework recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.

As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required.

**Change sought to make sound:** As such, the Coal Authority considers that, in order to properly address the requirements of MPS1, the associated good practice guidance and MPG3 the Core Strategy should incorporate the following:

- Safeguarding of the geological surface coal resources across the plan area through the designation of a Mineral Safeguarding Area. The Surface Coal Resource Plan available from the Coal Authority should form the evidence base for this process;
- Suitable policies/policy criteria to support the prior extraction of minerals where sterilisation would otherwise occur from built development;
- Suitable policies/policy criteria for dealing with energy mineral proposals, including surface coal;
- Site allocations for any relevant strategic proposals that may be put forward by the industry (you should note however that the Coal Authority cannot support any individual operator in their proposal; any support would be on the basis of licensed areas and/or viable resources being present); and
- Policies/policy criteria for appropriate restoration and aftercare, to the best industry standard, to ensure that no future legacy or public safety issues arise from poor restoration

Mineral Safeguarding Areas should be illustrated on the Core Strategy Key Diagram, with the Proposals Map then defining the precise geographical extent of the areas in due course. The proposed current approach will not achieve the effective implementation of national planning policy and is not justified by any locally distinctive circumstances.

The neighbouring City of Bristol proposed not to safeguard mineral resources through its Core Strategy, however after a preliminary conclusion that the Inspector considered that the Core Strategy would be unsound without addressing the issue, they have proposed an interim position within the Core Strategy. They are constrained by the inability to make substantial changes at the examination, the Bath and North East Somerset Core Strategy is not that advanced and there is still adequate opportunity for the plan to be amended to remedy the unsoundness.

Reason – To comply with the guidance in MPS1 (Planning & Minerals), the MPS1 Practice Guide,

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 106\1

**Respondent:** Pro Planning

**Representation (soundness):** The issue of minerals is considered to be both inadequately and inaccurately addressed in the five paragraphs 6.65 to 6.69 of the Core Strategy. It is a major issue for consideration through the Core Strategy and therefore merits, at the very least, a policy in its own right. PPS 12 requires Core Strategies to consider the minerals “contribution to national, regional and local needs at acceptable social, environmental and economic costs”. BANES Core Strategy is considered to be inadequate in these regards. The Core Strategy seeks to rely upon national minerals planning policy and safeguarded minerals policies in the BANES Local Plan, until reviewed through the Placemaking Plan. For soundness however, the Local Plan policies should at least be reviewed through the Core Strategy preparation process, to provide the strategic context for the Placemaking Plans.

Para 6.66 refers to there being currently two active sites, at Combe Down and Limpley Stoke. It omits to mention the outstanding minerals extraction consent at Stowey Quarry, Bishop Sutton, which is valid until November 2012 and is being actively reworked. Although this consent expires relatively early in the life of the Core Strategy, the interrelationship of that consent, with the adjacent safeguarded mineral reserves and the current use of the quarry for waste recycling, surely merits its inclusion in paragraph 6.66 to inform the need for a subsequent Placemaking Plan relating to it.

**Change sought to make sound:** Amend para 6.66 to read:

“There are currently three active sites – two surface workings and one underground mine. Upper Lawn Quarry at Combe Down in Bath, Stowey Quarry at Bishop Sutton and Hays Wood mine near Limpley Stoke. The two near Bath produce high quality Bath Stone for building and renovation projects and Stowey Quarry produces white lias and blue lias limestones for use as building and walling stone and also for aggregate purposes.”

A new Policy CPX: Minerals should be written to provide the context for the site specific Placemaking Minerals Plan.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 6.66**

**Reference:** 197\3

**Respondent:** Railfuture Severnside

**Representation (soundness):** Para. 6.66 refers to coal reserves which could be worked by surface mining; and to Bath Stone quarried at the Hayes Wood near Limpley Stoke. Rail transport would be the most environmentally friendly way of removing these heavy minerals to distant destinations but there is no medium in the CS as to how they would be transported. The availability of the rail transport is often made a condition of planning permission being given for extraction, as at Quidhampton and Dean, both near Salisbury. Also, rail has been used for short term flows of stone for sea defences in West Somerset in late 2010.

**Change sought to make sound:** Para. 6.66 should be amended to consider using rail transport in any future exploitation of coal reserves and for longer distance movement of stone. The disused but largely intact Radstock- Frome railway should be safeguarded for possible future coal (and other freight traffic). Investigations should be made as to the feasibility of forwarding stone by rail at Limpley Stoke (by safeguarding lane for a siding) or any other suitable railhead, in the event of demand for longer distance traffic.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

## Plan Reference: Paragraph 6.69

**Reference:** 95\3

**Respondent:** The Coal Authority

**Representation** The Core Strategy does not address the issue of unstable land, it is noted that the saved Local Plan  
**(soundness):** addresses the issue through Policy ES.14 it is not clear how and where this issue is now to be dealt with in the LDF. Policy ES.14 provided a comprehensive policy position and it also clearly indicated the broad spatial extent of areas where ground instability may arise as a consequence of former mining and quarrying activity. This would form a good basis for a new development management policy in a latter DPD.

However PPG14 requires both a strategic policy context and a development management type policy on the issue of unstable land. At present the Core Strategy does not propose to set any strategic context for the issue. The number of mine entries and other recorded hazards in the plan area from mining activity illustrate that it is a locally distinctive issue that needs addressing. To set an appropriate strategic policy context The Coal Authority considers that a policy criterion could be included within the Core Strategy either within Policy CP2 or Policy CP6, as the LPA sees fit, to address the policy vacuum.

**Change sought to make sound:** As a consequence of the coal mining legacy within Bath and North East Somerset, it is considered that policy criteria should be incorporated to ensure that new development proposals take account of any mining-related risks and, if necessary, incorporate appropriate mitigation measures to address them. This is required in accordance with paragraph 27 of PPG14. The following additional text is suggested for this purpose:

- “New development proposals within former coal mining areas should take account of any mining related risks and, if necessary, incorporate appropriate mitigation measures to address them.” The supporting text for this policy could also helpfully make reference to the fact that applicants will need the prior written permission of the Coal Authority in order to undertake any activities that intersect, disturb or enter any former coal seams, coal mine workings or coal mine entries.  
Reason – To comply with the guidance in PPG14 (Development on Unstable Land)

**Representation (legal compliance):**

**Change sought to make legally compliant:**

## Plan Reference: Policy CP9: Affordable Housing

**Reference:** 87\1

**Respondent:** New Dawn Homes Ltd

**Representation** The reduction in the affordable housing threshold from 14 units to 10 units and the requirement for  
**(soundness):** 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 make sound:** Affordable Housing policies should comply with National Standards and guidance  
**make sound:** Social Housing Grant should be applicable to new developments

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 102\20

**Respondent:** Federation of Bath Residents' Associations

**Representation** Policy CP9 (p123)(Affordable housing)

**(soundness):** The only difference between ‘affordable housing’ and other housing is a public rental subsidy, which can be applied to any housing and not only to that delivered in new developments. Planning gain can



be extracted from developers in other forms and used generally for social housing subsidy. The reality is that Bath, as a preferred place to live, will always attract people who do not depend upon local employment, keeping house prices high in relation to local employment earnings. Adding to the housing supply will only marginally affect this imbalance.

**Change sought to make sound:** The emphasis should be on a long term higher value economic mix (as planned in the Core Strategy) and on promoting a cultural acceptance of house renting rather than ownership (Bath rental costs are much more cost effective and in line with local employment incomes than is home ownership).

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 143\9 S

**Respondent:** Bathampton Parish Council

**Representation** We welcome the requirement to provide 17.5% of AH on small sites of 5-9 dwellings or 0.25 to 0.49 ha.

**(soundness):** However, such a mandatory requirement may work well against the intention of the policy by stimulating applications for permissions 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, including the subdivision of existing premises, in the rural settlements.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 162\9

**Respondent:** Batheaston Parish Council

**Representation** We welcome the requirement to provide 17.7% of AH on for small sites of 5 to 9 dwellings or 0.25 to

**(soundness):** 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

**Change sought to make sound:** Under Small Sites add ' On sites of fewer than 5 dwellings some provision of affordable housing will be sought either on-site or by the provision of commuted resources for such development elsewhere'.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 190\2

**Respondent:** Newton St Loe Parish Council

**Representation** Dear Sir,

**(soundness):**

Draft Core Stratgey

We write to endorse the Draft Core Strategy. As you know there has been an enormous amount of research, consultation and heart-searching that has gone in to this strategy. We support the housing target, although would prefer to see more social housing and fewer market-priced houses, as that is the need locally.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 239\18

**Respondent:** Keynsham Civic Society

**Representation** Small sites: the acceptance of a commuted sum for less than 17.5% provision of affordable housing,  
**(soundness):** reads as if a monetary transaction is involved. Consider that this should refer only to the acceptance of a lower percentage than the 17.5%.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 246\8 S

**Respondent:** Combe Hay Parish Council

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

33. Policy CP9.  
Page 123

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 251\3

**Respondent:** Bovis Homes

**Representation** Bovis Homes wishes to draw attention to the other representations submitted by Barton Willmore.  
**(soundness):**

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 252\10

**Respondent:** Cadbury Kraft Foods

**Representation** Affordable Housing Policy CP9 states that affordable housing will be required as on-site provision in  
**(soundness):** 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.

**Change sought to make sound:** 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.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 255\3

**Respondent:** Taylor Wimpey Developments

**Representation (soundness):** Why We Consider The Core Strategy Unsound

We submit that Policy CP9 is unsound in that it has not been properly justified. It does not take account of the special circumstances surrounding the creation of a new neighbourhood and the BANES Viability Study inadequately addresses the land value that will be acceptable to land owners for the generality of sites and the assumption is made that no grant will be available.

The first part of our objection is submitted to support our objection to Policy DW1: District-wide Spatial Strategy, which seeks to reinstate the proposal for a new community at Whitchurch.

In circumstances where a new community is created it is our submission that the level of affordable housing should be no greater than that seen in the wider community. Otherwise, high levels of affordable housing will have a distorting effect on the character of the neighbourhood, since it is of sufficient size to set its own character. The proportion of social rented dwellings in Bristol in 2006 was 22.5% (West of England SHMA Table 5.1 p69). This is the relevant figure since the proposal is for an urban extension to Bristol. On the basis of this we propose that affordable housing levels in a new community at Whitchurch, if reinstated, should not exceed 25%.

A number of factors will affect viability over the plan period. First, densities may well decline from the expected norms of 50 dph plus, particularly on larger sites, if the emphasis is more on family housing as expected. The issue of residual values is a difficult one and a judgement needs to be made on what a landowner is likely to accept. The effect of the Community Infrastructure Levy, which is now a key proposal of the Government to direct money to neighbourhoods, is not known. We also object to the Council's proposal that grant will not be available for affordable housing. We therefore submit that the viability assessment requires review and cannot be considered robust.

We therefore object to the level of 35% affordable housing.

**Change sought to make sound:** 1. A maximum of 25% affordable housing in a new neighbourhood on the edge of Bristol;

2. A reduction on the normal level of affordable housing from 35%

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 257\2

**Respondent:** Valley Parishes Alliance

**Representation (soundness):** The requirement to provide 17.7% of Affordable Housing on small sites of 5 to 9 dwellings or 0.25 to 0.49 acre is welcomed. However, such a requirement may work against the policy by stimulating applications for 4 dwellings. For that reason the CS should explicitly encourage the LPA to seek some provision of AH on sites of fewer than 5 dwellings in the rural settlements.

**Change sought to make sound:** Add to Small Sites (p123) 'In the rural settlements on sites of fewer than 5 dwellings a proportion of affordable dwellings may be sought.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 259\4

**Respondent:** Edmund Bruegger

**Representation (soundness):** Policy CP9 – Affordable Housing

It is clear from past delivery rates of affordable housing that the percentage of affordable housing is nowhere near being met and therefore to propose a requirement of 35% would be setting an unachievable target.

The proposed site size threshold of 1.5 ha or 10 dwellings which would trigger a need for affordable housing is not based on sound evidence. Such a low threshold would result in smaller developers being priced out of the market as they would be financially be unable to provide affordable housing on these smaller sites. A higher site size threshold should be proposed.

We object to the blanket split between social rented and affordable intermediate housing as 75:25 respectively. The tenure split should be site specific and based on the local needs of the area.

Furthermore, the issue of economic viability has not been taken into account in the formulation of this policy. The policy, the proportion of affordable housing requested the tenure split and the site size threshold are all unsound unless they are underpinned by a viability assessment in line with national policy and the decision in Blyth Valley DC v Persimmon Homes (North East) Limited [2008].

The Core Strategy is largely dependent on the delivery of open market housing to assist in addressing the affordable housing needs of the District. Developer viability is therefore the key consideration in determining the extent to which affordable housing can be provided as part of a package of development on individual sites. In this regard, paragraph 29 of PPS3 'Housing', which relates to affordable housing, notes the importance of likely economic viability. Furthermore, the policy is at odds with Policy DW1 of the Pre-Submission Core Strategy. Policy DW1 is derived from what can be delivered in the District whereas Policy CP9 is derived from need. Whilst we have objected to the way in which the overall housing level has been calculated there needs to be a consistent approach to these policies.

**Change sought to make sound:** Changes Required

- make sound:** i) Policy CP9 should make reference to the fact that lower levels of affordable housing provision will be accepted on sites where a viability argument can be demonstrated.  
ii) The site size threshold should be increased so as not to discourage smaller house builders from developing sites.  
iii) The tenure split between rented and intermediate housing should be site specific and therefore reflect local needs.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 269\6

**Respondent:** Barratt Homes Bristol

**Representation (soundness):** Policy CP9 – Affordable Housing

It is clear from past delivery rates of affordable housing as set out in the Council's Viability Study (June 2010) that the percentage of affordable housing is nowhere near being met and therefore to propose a requirement of 35% would be setting an unachievable target.

**Change sought to make sound:** Change Required

**make sound:** The level of affordable housing sought by Policy CP9 is unrealistic and is unlikely to be met based on

past delivery rates. The level should be reduced.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 270\6

**Respondent:** Blue Cedar Homes

**Representation (soundness):** Policy CP9 – Affordable Housing

It is clear from past delivery rates of affordable housing as set out in the Council's Viability Study (June 2010) that the percentage of affordable housing is nowhere near being met and therefore to propose a requirement of 35% would be setting an unachievable target. The proposed site size threshold of 0.5 ha or 10 dwellings is not based on sound evidence. Such a low threshold would result in smaller developers being priced out of the market as they would be financially unable to provide affordable housing on these smaller sites. A higher site size threshold should be proposed. We object to the blanket split between social rented and affordable intermediate housing as 75:25 respectively. The tenure split should be site specific and based on the local needs of the area.

**Change sought to** Changes Required

- make sound:**
- i) The level of affordable housing sought by Policy CP9 is unrealistic and is unlikely to be met based on past delivery rates. The level should be reduced.
  - ii) The site size threshold should be increased so as not to discourage smaller house builders from developing sites.
  - iii) The tenure split between rented and intermediate housing should be site specific and therefore reflect local needs.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 276\8

**Respondent:** Hignett Family Trust

**Representation (soundness):** In 6.76 the SHMA has demonstrated a high level of need for affordable housing which is unmet. Indeed based on this evidence we are told "the Council could theoretically require 100% of all future planned residential development to be affordable housing". This is a remarkable admission.

The relevant Strategic Objective arising from the Spatial Vision is Objective 5: Meeting Housing Needs, yet there is no over-riding objective of meeting affordable housing need.

As a consequence of past failure in planning and achieving delivery of new dwellings as revealed in AMR 's the demand for homes in the Bath travel to work area has exceeded supply and this has inevitably lead to ever higher prices and ever reducing affordability. Indeed Bath has consistently been at the very top of the national statistics for unaffordability as measured by the ratio between average house prices and average incomes. This has severely disadvantaged sections of the indigenous population whose plight seems to be largely ignored by the Council. Those with a relatively modest income are clearly expected either to live and work elsewhere (hence the planned reduction in manufacturing workspace achieved in the past and proposed again for the plan period to 2026) or else they are expected to move out to the Somer Valley or neighbouring authorities such as the West Wiltshire Towns or Bristol, and to commute in to the City (in conflict with Key Objective 1, "reducing the need to travel by achieving closer alignment of homes, jobs, infrastructure and services").

Policy CP9 attempts to address this challenge in the same way which has so manifestly failed to deliver affordable housing in the past: it gears the number of affordable dwellings to the delivery of open market housing. But as we make clear elsewhere, there has been a serious failure to deliver open market housing in the past, and every sign that this Council is just as unconcerned over this issue for the coming plan period. For this reason the Policy is unsound.

The strongest and most vociferous anti-housing lobby is comprised of existing homeowners who have

seen the value of their realty rise dramatically as a direct consequence of the Local Authority's policy of housing non-delivery. Their green arguments have a strong underlying tinge of commerciality and a clear lack of concern for their less fortunate fellow citizens.

Ultimately the route to improved affordability is (i) to raise the average income of the indigenous population by supporting and encouraging all types of high wage employment (not just office based) and (ii) to increase substantially the supply of new dwellings, thereby lowering their market price. This should be the Council's medium term objective. Until this policy begins to deliver results an enhanced level of provision of Affordable Homes will be required. Accordingly we believe that the Council should have a policy commitment to deliver a specifically targeted number of affordable homes each year during the plan period, and furthermore that these should be located where the demand is and designed and specified for the age and family requirements of the occupants concerned, including sheltered and very sheltered provision for the rapidly increasing elderly population.

**Change sought to make sound:** CP9 should include annual delivery requirements for affordable housing apportioned between the geographical areas of the Authority and the age range of the residents to ensure that a significantly greater proportion of the demand is met.  
Propose amendment to Policy CP 9 by adding the following wording at the beginning of the policy, namely:

The CS shall deliver a minimum 230 affordable units per year (avg over a 5 year period) at the following locations:

Bath annual total residential ie total residential /20 x (minimum of 25 % ) 10150/20 x 25% =126 units  
Keynsham  
NR

Reasons :Affordable housing should not be directly related to open market delivery, new definition of affordable housing ( Coalition Gov. ) wider definition from SPD 'extra care residential' , securing a stronger commitment in policy to delivering this need for affordable housing.

Given that central Government support of such delivery through HCA is likely to be severely restricted once the present tranche of funds is exhausted, the market will depend upon the ability of RSL's to develop innovative schemes integrated with or with out open market housing.

The proposed New Neighbourhood at Odd Down will be well placed to deliver a considerable range and number of affordable dwellings, including extra care residential in a sustainable location and for this reason this proposal should be supported. The adjacent scheme at Sulis Meadows constructed in the 1990's arose from the same land ownership (the Hignett Family Trust) which was instrumental in ensuring that a substantial affordable component was included among the 350 homes built at that time. The Landowners' commitment to the provision of affordable housing remains just as strong 20 years later. Good housing in cohesive communities remains critical to strong families and all the good things which flow from a sound family life. ( Include within policy for New Neighbourhood )

#### **Representation (legal compliance):**

#### **Change sought to make legally compliant:**

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**Reference:** 277\5

**Respondent:** Ashtenne Industrial Fund Limited Partnership

**Representation** Policy CP9 – Affordable Housing

**(soundness):**

Ashtenne acknowledges the 35% affordable housing targets. The Council has recognised within the supporting text that in some cases, the viability of schemes may be jeopardised by affordable housing if there are higher than normal redevelopment costs. This is often the case when redeveloping brownfield land, and it is therefore important to retain this acknowledgment.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 278\7

**Respondent:** Cotswolds Conservation Board

**Representation (soundness):** The Cotswolds Conservation Board supports the policy for “Affordable Housing” as set out in Policy CP9.

**Change sought to make sound:**

**Representation (legal compliance):** The Cotswolds Conservation Board supports the policy for “Affordable Housing” as set out in Policy CP9.

**Change sought to make legally compliant:**

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**Reference:** 285\2

**Respondent:** Aviva

**Representation (soundness):** 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.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 286\9

**Respondent:** Horseworld

**Representation (soundness):** The Core Strategy also fails to take account of the underlying current shortfall in affordable housing provision and the need to provide future affordable housing to a level which is currently above and beyond that which can be achieved given the housing numbers outlined in the Core Strategy.

The Core Strategy proposes 11,000 new homes which limits the future provision of affordable housing to a maximum of 3,400. This means that the affordability gap in BANES is going to continue to rise meaning that at the next plan period BANES is going to find itself in a position whereby house prices have continued to rise well above the national average and well above the affordability of the majority of the population of BANES.

Bath and North East Somerset's Core Strategy - Publication Stage Representation Form The only way that BANES can influence the affordability crisis which currently exists is for the delivery of additional housing capacity. Basic economics demonstrates that the increased supply of housing within BANES will result in a natural reduction in costs and will also have the additional benefit of providing more affordable housing for local residents through the s106 process. It is clear that BANES has prioritised the protection of Greenfield sites over the delivery of sufficient housing to meet the needs of the population.

The Core Strategy is unsound because it has failed to properly consider the evidence base in respect of the need for affordable housing. The policy is also unsound because it fails to accord with national policy in terms of the requirement to deliver sufficient affordable housing to meet the current and future needs of the population. It is estimated that there is an unmet demand of 2,900 affordable units in BANES, therefore the delivery of 3,400 units in the period to 2026 is clearly insufficient. The policy is not consistent with PPS3, paragraph 29 in that it does not meet current and future needs.

**Change sought to make sound:** Housing numbers should be increased to at least the numbers proposed in the Draft RSS (15,500), and more realistically to the figure proposed in the SoS Proposed Changes (21,300). This would allow the delivery of the 2,900 homes needed to meet the existing unmet demand for affordable housing within the BANES district.

To achieve the housing numbers advocated by the RSS, 3,500 homes should be provided as an urban extension to Bristol, within BANES, at Whitchurch to ensure the long term prosperity and sustainable development of the BANES district.

The increased provision of homes will secure the provision of a sufficient amount of affordable housing to meet the current and future needs of the local population whilst helping to reduce the speed of increase in house prices by bring more houses to the market.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 288\1

**Respondent:** Glenavon Farm Partnership

**Representation (soundness):** Why We Consider The Core Strategy Unsound

We object to Objective 2 in that it does nothing to meet social and economic objectives for the District and is therefore contrary to national policy.

PPS1 paragraph 4 sets out four areas for sustainable development:

- Social progress which recognises the needs of everyone;
- Effective protection for the environment;
- The prudent use of natural resources; and
- The maintenance of high and stable levels of economic growth and employment.

These remain Government policy and the present Government has placed sustainable development at the centre of its planning policies.

We have shown in our objections to Policy DW1 that the Core Strategy's proposals do not meet the



social and economic needs of the District. As such there is no effective balance between the four objectives of sustainable development and the proposals are therefore not sustainable. It is not sustainable to consistently underprovide for housing nor to make inadequate provision for new job growth.

We also submit that Objective 2 completely contradicts Objective 3, which seeks to stimulate a more productive, competitive and diversified economy. It also contradicts Objective 5 which seeks to respond to expected demographic and social changes and to support the labour supply to meet economic objectives.

**Change sought to make sound:** Objective 2 should be recast to reflect all four objectives of PPS1 paragraph 4.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 292\17

**Respondent:** Bath Avon River Corridor Group

**Representation (soundness):** Policy CP9 p123 By going straight into the detail of AH provision the Strategy lacks an expression of the higher ambition of seeking to create an economy in which more housing is affordable, more people have jobs, ie that the Economy needs to be regenerated as the first priority. This means also creating jobs in areas where land and living costs are lower and improving transport links with such areas.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 300\5

**Respondent:** Somer Housing

**Representation** Policy CP9 – Affordable Housing

**(soundness):** 6.5 Broadly we support this policy. We are pleased to see that the Council has resisted the temptation to set the affordable housing target so that negotiations become a serious resource issue. The Council's tenure split will help to deliver mixed and balanced communities as per our previous recommendations; and the affordable housing requirement sets a target which takes in to consideration viability.

6.6 We were disappointed to see that previous proposals to set a geographical split for the affordable housing policies have been dropped. In diverse areas such as BANES where there are huge differences in land values across the District, this could have been used to extract the maximum levels of affordable housing from the higher value areas. We support simple and easy to implement policies, but given the range of land values and the findings of the Three Dragons Viability Study we would have supported a geographical split.

6.7 We consider that the criteria for a 45% requirement as set out in the proposed policy are so vague that a developer will never be certain when it will be required. This would make it extremely difficult for a developer to negotiate a price on a site. A geographic split has its downsides, but it does offer developers' certainty on what they will be required to pay and this would allow for a smoother and more reliable delivery of sites and affordable housing.

6.8 We strongly urge the Council to clearly define the areas where it will expect the 45% requirement to be applied. These could be smaller subareas within those set out in the map from the Three Dragons Viability Study.

6.9 We note that Three Dragons has not tested any higher requirements for Code for Sustainable Homes above Level 4. We understand that there will be changes to how schemes will be expected to

meet these standards, but we still expect them to be more stringent and therefore more expensive than meeting levels 3 and 4. We would therefore have expected the study to consider a number of other options, as has been done in relation to a number of other issues - including the impact on viability with; no increased cost; a low increase cost; and a high increased cost of meeting levels 5 and 6.

6.10 The impending reductions in public funding for affordable housing and the high level of need identified in the SHMA compared to that which the proposed housing target will provide, will mean that it is imperative for housing associations, such as those in the Somer Housing Group, to explore new and innovative methods of providing affordable housing. It will be equally imperative for the Council to provide specific policy support for such innovation in the Core Strategy. We recommend that the following wording is inserted in to the policy: 'Significant extra weight will be given to the delivery of sites which provide affordable housing above the requirements set out above. The Council will look favourably on new and innovative schemes that will deliver significant amounts of affordable housing without public subsidy.'

6.11 We are generally content with the policy wording on thresholds. However, we recommend that the updated Affordable Housing SPD will clarify what happens to small schemes of less than 10 units which are delivered by housing associations. These schemes should not get caught by the affordable housing requirements for general market schemes. If housing association schemes are delivering affordable housing above the proposed requirement there should be flexibility to set the housing mix accordingly to provide the maximum amount of affordable housing possible.

6.12 As previously stated, we support the newly proposed tenure split. However, the Council will need to decide if the change in emphasis away from social rented housing and towards the 'affordable rent' model necessitates a review. We have already highlighted the problems associated with the target of delivering only 3,400 affordable dwellings in the District. With details of reform and how affordable rents would be applied in BANES still not available, we recommend that any additional value captured from affordable rent should be used to provide more social rent not towards developer's profits.

6.13 Without the changes as above we do not consider the policy is sound on the grounds that it is not justified or effective as set out by the tests of soundness in PPS12.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 301\7

**Respondent:** South West RP Planning Consortium

**Representation** Policy CP9 – Affordable Housing

**(soundness):** We broadly support this policy. We are pleased to note the Council has accepted most of our recommendations from our previous representations. We do, however, still have some concerns with this policy which we would like to see amended. Firstly, our preference is for an affordable housing requirement which operates on a geographical split. We consider that the proposed policy of 35% across the District, except in 'areas with above average land values' is imprecise and will lead to a lower level of affordable housing delivery than the geographical split previously considered.

The Council has commissioned a viability study considering three potential affordable housing policy options. Our preferred option is set out below: 'Introduce a two way split target between generally higher and generally lower value areas. We would suggest a 40% target for Prime Bath, Bath Rural Hinterland, Bath North and East and Chew Valley Higher; and a 30% target for Bath North and West, Bath South, Chew Valley Lower, Keynsham and Saltford and Norton Radstock, Paulton and Peasedown.'

This recognises the marked differences in land values across the District. The lower percentage for the south of the District will encourage housing development and should lead to applications being processed quicker as there will be less need for viability assessments. In the higher value areas it offers more certainty to developers on the affordable housing requirement when acquiring land. As currently written the policy offers considerable uncertainty for landowners and developers and may lead to developments being taken to appeal unnecessarily.

We support the affordable housing thresholds as proposed. We consider that the wording on sub-division and phasing should clearly state that: 'any attempt to deliberately circumvent the affordable threshold will result in planning permission being refused.' Whilst we understand the reasoning and needs basis for the proposed tenure split in paragraph 6.77, in view of emerging changes to national policy, the Council will need to decide if the change in emphasis away from social rented housing and towards the 'affordable rent' model necessitates a review. With details of the reform and how affordable rents would be applied in BANES still not available, our key recommendation is that any additional value captured from affordable rent should be used to provide more social rent not towards developer's profits.

Finally the Council is proposing that all affordable housing should remain at an eligible price for future generations, that is, in perpetuity. Whilst we support the principle behind this proposal it does not strictly accord with government guidance and may make it difficult for developers to obtain funding. The annex to PPS3 – Delivering Affordable Housing, clearly states that the emphasis should be on recycling government subsidy from the sale of affordable housing through the Right to Buy. This has been established on numerous occasions, most notably in the Inspector's Report in to the South Hams Affordable Housing DPD (extract enclosed).

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 318\5

**Respondent:** MOD

**Representation (soundness):** The commentary contained in paragraph 1.34 identifies an affordable housing requirement of "around 3000" during the plan period, but the reference in the Policy DW1 is to "around 3400". This inconsistency is unhelpful and should be rationalised and justified by the planning authority by reference to a sound basis for definition, based on the demonstrable forecast housing needs of the population.

This issue highlights a requirement by the planning authority to provide incontestable evidence to justify the reasoning behind the development of the current policy for a provision of 35% overall on average, as promoted by Policy CP9, and, in particular, a requirement for up to 45% on some sites.

**Change sought to make sound:** The presentation by the planning authority of convincing evidence to demonstrate clearly that this policy can be fairly and consistently applied to ensure appropriate levels of affordable housing can be delivered in the most disadvantaged locations throughout the district.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 819\5

**Respondent:** Paulton Parish Council

**Representation (soundness):** Affordable Housing, parts of this document appear to be contradictory, can you review the criteria for allocating affordable housing to benefit those who are, and have been born or have resided in a village for a number of years?

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Policy CP10: Housing Mix**

**Reference:** 33\1 S

**Respondent:** Ms Margaret Crossley

**Representation** Redevelopment or new housing is essential for individuals or couples e.g. bedsits, one and two  
**(soundness):** bedroom flats. It is well known that lower income or younger adults have great difficulty living locally. Many live out of area or are still with parents. We need to meet the needs of all our residents.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 217\3

**Respondent:** National Grid Property Holdings Ltd

**Representation** 2) Effective

**(soundness):** Deliverability

National Grid (NG) are committed to working with the Council, other landowners and stakeholders to deliver the redevelopment of the Midland Road / Windsor Bridge Road site, which offers a highly sustainable location for development which would contribute to the wider regeneration of the Western Riverside Area. Draft Policy CP10 relates to Housing Mix, and sets out that new housing development, both market and affordable, must provide for a variety of housing types and size to accommodate a range of different households. It goes on to state that the mix of housing should contribute to providing choice in tenure and housing type, and that housing developments will also need to contribute to the provision of homes that are suitable for the needs of older people, disabled people and those with other special needs.

Whilst NG are generally supportive of this policy approach, the site at Windsor Bridge Road is subject to significant development constraints, particularly the considerable remediation costs associated with the decommissioning of the gas holders. As such, it is important that the policy allows some flexibility in terms of housing mix where such requirements may serve to compromise the viability of certain sites – like the NG site at Windsor Bridge Road – being brought forward for development. Policy CP10 is not effective in its current form as it could compromise the viability of any redevelopment of the NG site at Windsor Bridge Road, and therefore prevent it being delivered. It is therefore essential that the policy is amended such that it provides for some flexibility in terms of housing mix where this is required to ensure that the viability of redevelopment is not compromised.

**Flexibility**

The proposed policy is too restrictive whereby it does not provide for any flexibility in terms of housing mix for residential developments in the case of sites which are subject to significant, abnormal costs in order to enable them to be brought forward for development. As detailed above, the redevelopment of the NG land at Windsor Bridge Road will be subject to significant abnormal costs associated with the decommissioning and removal of the existing gas holders, and the subsequent remediation of the land. These factors, combined with current economic conditions, are likely to have a significant effect on the viability of any future development of the site. Policy CP10, as currently drafted, is not

sufficiently flexible to allow an appropriate housing mix where this is required to make redevelopment viable. As such, some text should be including stating that, where development constraints may result in abnormally high development costs impacting upon the viability of redevelopment, the housing mix may be negotiable.

### 3) Consistent with National Policy

The rehabilitation of contaminated sites is supported by PPS1 entitled 'Delivering Sustainable Development' which seeks to promote the re-use of brownfield sites for development in conjunction with the goal of making suitable land available for development, in line with economic, social and environmental objectives. There are benefits in terms of meeting sustainable development objectives and reducing the threat posed to health and the environment by remediating contaminated brownfield sites. However, the substantial costs associated with decontamination can lead to a situation whereby the costs are so prohibitive that it is not financially viable to bring a site forward for development.

Paragraph 26 of PPS1 states in regard to development plans that they should:- "(iii) Not impose disproportionate costs, in terms of environmental and social impacts. Or by unnecessarily constraining otherwise beneficial economic or social development." Furthermore, DETR Circular 01/2006, entitled 'Contaminated Land', sets out objectives for such land:

- To identify and remove unacceptable risks to human health and the environment;
- To seek to bring damaged land back to beneficial use; and
- To seek to ensure that the cost burdens faced by individuals, companies and society as a whole are proportionate, manageable and economically sustainable.

DETR Circular 02/2000, 'Contaminated Land' (now superseded by DETR Circular 01/2006, Contaminated Land) provided the policy framework behind PPS23, Planning and Pollution Control. It may not be feasible for a developer to pay for the substantial remediation costs required in addition to the costs of development, and the often heavy financial burden of S106 contributions. Such a sum may be deemed disproportionate and in those circumstances may not be in compliance with either PPS1 or DETR Circular 01/2006. If sites are not developed they cannot contribute to 'the maintenance of high and stable levels of economic growth and employment'. In its current form, by requiring a form of development which is not viable, the draft Policy is contrary to the economic principles of PPS1.

The issue of whether remediation costs should be taken account of when assessing viability was considered by the Planning Inspectorate in an appeal (ref: APP/C4615/A/08/2066072) at the Former Gas Works, Constitution Hill, Dudley (allowed 13th August 2008). The appeal related to the redevelopment of the site for 162 residential units. The Inspector outlined the main issue when he stated in paragraph 12:- 'A major consideration within the viability reports undertaken is the expenditure involved in remediating the site, and there is significant allowance for the abnormal costs which would arise because of the particular characteristics of the site'. He went on to state:- 'An issue of major significance in assessing the validity of the viability studies is whether the costs of this remediation, amounting to £2.85m, should be deducted for the potential value of the completed development in assessing the residual land value, and thus the economic viability of the alternative developments under construction'.

It was the Council's position that the "polluter pays" principle should be applied, on the basis that the appellant or its predecessors had benefited from the profits that arose from the pollution of the site:- 'It should thus meet the cost of remediation from its current assets to which these profits have contributed. The Council considers that the "polluter pays" principle is supported by the EPA.' After considering the evidence the Inspector concluded in paragraph 17 of his report that:- '... it is appropriate for the costs of the voluntary remediation of the site to be taken into account in assessing the viability of different forms of development on the site. It further seems to be reasonable and correct that, by extension, the costs of further remediation and abnormal works, arising from the nature of the land and its past use but relevant to the particular form of development

being assessed, should be taken into account in the same way.’  
(our underlining) This appeal decision establishes a precedent that it is appropriate for planning decisions to take account of the abnormal costs of remediation works. Likewise, it is fair and reasonable that the policies should take into account the high costs of remediation. In addition, and in the context of the above, it is also important to consider such abnormal costs in considering housing mix requirements. Whether this is in the Core Strategy, or other DPD, the policy wording must ensure that specific mention is made of the fact that any specific housing mix will be sought having regard to economic viability and site specific circumstances. This is to ensure that the policy is sufficiently flexible to be responsive to matters such as abnormal costs which will arise in bringing sites forward for development, and to ensure accordance with the requirements of PPS3. Where open book viability assessments are required, provision should be made for those circumstances. Where an open book assessment cannot be made publicly available this information may need to be treated on a confidential basis.

**Change sought to** In order to make the policy sound, the following wording should be added: • Where sites are subject to  
**make sound:** abnormal redevelopment costs, such as those associated with the remediation of contaminated land, there may be scope for flexibility in defining an appropriate housing mix.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 248\13

**Respondent:** Crest Strategic Projects and Key Properties Ltd

**Representation** 1) RPS does not object to the policy wording but queries how effective it will be in delivering its

**(soundness):** objectives. The majority of the previously developed sites identified are unlikely to provide a context for the delivery of a wide mix of housing, and in particular family housing. PDL sites more often than not are urban sites where densities are high in order to secure viable proposals. As set out in our submission and recognised in the SA, large urban extensions have the capacity to deliver a wide range of housing (including affordable housing) to meet all aspects of need and demand through the creation of mixed and inclusive communities.

2) There are few such opportunities to deliver the policy requirements of Policy CP10 under the current strategy. In that sense it is ineffective because of the failures of the overall strategy.

**Change sought to** 1) RPS queries the value of the policy when the strategic housing requirement and spatial strategy is  
**make sound:** unlikely to deliver what it is seeking.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 259\5

**Respondent:** Edmund Bruegger

**Representation** Policy CP10 – Housing Mix

**(soundness):** The principle of providing a mix of housing type and tenure is supported in principle having regard to the existing mix of dwellings in the locality and the character and accessibility of the location. However, within rural Areas where local communities have indicated support for additional development consideration should be given to the view of these communities in terms of the housing mix that should be delivered from allocated site.

**Change sought to** Policy CP10 needs to be amended to include reference to the view of the local communities which  
**make sound:** would be in line with Policy RA1.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 264\4

**Respondent:** Englishcombe Parish Council

**Representation** The Parish Council fully and enthusiastically supports the whole of Policy 6c.

**(soundness):** We would additionally, however, like to see a commitment by B&NES to insist that Developers achieve seamless integration within a mixed development of owner occupied dwellings and social/affordable dwellings.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:** B&NES and Developers should ensure that all dwellings, whether owner occupied or affordable/social, should integrate seamlessly

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**Reference:** 269\7

**Respondent:** Barratt Homes Bristol

**Representation** Policy CP10 – Housing Mix

**(soundness):** The principle of providing a mix of housing type and tenure is supported in principle having regard to the existing mix of dwellings in the locality and the character and accessibility of the location. However, within rural areas where local communities have indicated support for additional development consideration should be given to the view of these communities in terms of the housing mix that should be delivered from allocated site.

**Change sought to** Change Required

**make sound:** Policy CP10 needs to be amended to include reference to the view of the local communities which would be in line with Policy RA1.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 270\7

**Respondent:** Blue Cedar Homes

**Representation** Policy CP10 – Housing Mix

**(soundness):** The principle of providing a mix of housing type and tenure is supported in principle having regard to the existing mix of dwellings in the locality and the character and accessibility of the location. However, within rural areas where local communities have indicated support for additional development consideration should be given to the view of these communities in terms of the housing mix that should be delivered from allocated site. The reference to the need to contribute to the provision of homes that are suitable for older people is welcomed.

**Change sought to** Change Required

**make sound:** Policy CP10 needs to be amended to include reference to the view of the local communities.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 300\6

**Respondent:** Somer Housing

**Representation** Section 7 Specialist and Student Housing Housing for the Elderly

**(soundness):** 7.1 Earlier sections of this report highlight that the main area of demographic growth in BANES over the Core Strategy period is likely to come from the 65+ age group. This offers a new set of challenges and the existing housing stock will not be equipped to deal with large scale of growth of a group which has particular and changing care needs.

7.2 We expect that the Coalition Government will announce that all new public and private housing should be built to the same requirements and these should be set by the local authority. We expect the most local authorities will want to include is a requirement to meet the Lifetime Homes Standard. Building Lifetime Homes alone will not help to address the deficiencies in the existing housing and care stock. This is of particular concern to our clients because 50% of Somer's residents are aged 60+.

7.3 Elderly people need a range of options to address their varying care needs. This could be anything from increased support in their own home, sheltered housing, Extra Care housing, care homes or Continuing Care Retirement Communities (CCRCs).

7.4 The Sustainable Community Strategy, which the Core Strategy must comply with states that the Council will work to: 'Develop choice and promote independence by providing services and opportunities in different settings and in new ways. We will focus on the changing needs of local people and the growing elderly population'.

7.5 PPS12 requires all Core Strategies to reflect the aims of their Community Strategies.

7.6 We note that the Council has included a requirement for new developments to include housing which provides for all sections of the community, including the elderly. The policy wording is unclear and will probably simply lead to the delivery of homes that meet the Lifetime Homes Standard. As articulated above, this will not be sufficient.

7.7 Providing specific elderly care and accommodation schemes will also have another beneficial consequence – freeing up homes for others. Quite often elderly people will be under occupying large houses that are unsuitable for their care needs. Of course many of these people will want to stay in their homes for as long as possible, but others will be prepared to move. Somer's experience is that people will move if the right product for them is available. We are concerned that as care providers try to bring forward these products there will be a policy vacuum for decision makers.

7.8 Somer has also identified a need to improve facilities' for people with a disability or learning difficulty. There is a particular need for new facilities for young people under the age of 50 with a disability or learning difficulty. Recognition of the benefits of delivering this type of housing would make it easier to deliver this type of housing or care facility.

7.9 We recommend that the Council includes a policy as below: 'The Council will encourage the delivery of the full range of care and accommodation needs of the elderly and people with a disability. This will include a range of suitably located developments for these groups, including, inter alia: Extra Care housing, Residential Care Homes, Sheltered Housing and Continuing Care Retirement Communities (CCRCs)'

7.10 The supporting text of such a policy should take in to account efforts to modernise the stock of housing and care for the elderly which reflect Government policy. As such, any future policy should not try to protect existing care and accommodation which is not fit for purpose. The redevelopment of existing care homes and sheltered housing has previously helped to deliver modern, fit-for-purpose accommodation previously and should be allowed to do so in the future. The supporting text for the above proposed policy should encourage such redevelopments.

7.11 Given that this section of society makes up such a significant proportion of demographic growth, we consider that failure to properly address this issue would make the Core Strategy unsound on the grounds that it is not effective or justified.

#### Student Housing

7.12 As we have stated in previous representations students are outcompeting home owners for first time properties. Once they graduate these students are then unable to purchase homes in Bath and are forced to move on. The City therefore loses out on two fronts - firstly high house prices and secondly an inability to retain the skills and benefits of having two universities. Significant pressure could be resolved on the house prices in Bath if more student accommodation is provided.

7.13 The current policy does not offer enough encouragement and support for the delivery of this type of housing. Along with the other policies on housing target it is likely to bring about a further worsening of affordability in the District.



**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 301\8

**Respondent:** South West RP Planning Consortium

**Representation** Policy CP10

**(soundness):** We would like to see further clarification of what is meant by 'housing of types and sizes suitably for... low income households'. If this just means Low Cost Market Housing, then this is welcomed as it will help take the pressure off the affordable housing stock in the District.

We are pleased to see the Council is starting to consider the needs of the elderly people and disabled people in this policy and requiring a proportion of housing which meets its needs within new developments. However, much more needs to be done. The Council should encourage the delivery of the full range of care and accommodation options for older people. We recommend the insertion of the policy as below: 'The Council will encourage the delivery of the full range of care and accommodation needs of the elderly and people with a disability. This will include a range of suitably located developments for these groups, including, inter alia: Extra Care housing, Residential Care Homes, Sheltered Housing and Continuing Care Retirement Communities (CCRCs).'

6g Infrastructure

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Policy CP11: Gypsies, Travellers and Travelling Showpeople**

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**Reference:** 111\1

**Respondent:** Traveller Law Reform Project

**Representation** 1. para 6.81 and 6.82

**(soundness):**

These paragraphs fail to mention the Regional Spatial Strategy which in view of the recent Cala Homes judgement still stands and hence the policy is unsound because it is not conformable with regional policy. The panel report of the EIP into the Gypsy and Traveller Policy GT1 stated in relation to BANES:

Bath and North East Somerset

4.39 The panel also asked at the Examination why Bath and North East Somerset Council was now proposing a nil transit provision for its District despite Revised Table 4.3 indicating 20 transit pitches for this local authority area. We do not accept the Council's argument that since the GTAA indicated a primary need for residential pitches it would be premature to estimate transit needs before residential ones and this supposition has no foundation in Circular 01/2006. We conclude therefore that in the absence of any evidence to support the suggested nil provision, the figure of 20 pitches for transit provision in Bath and North East Somerset should be retained.

It went on to state in Table 4.3 that there was a need for 19 residential pitches in addition to the 20 transit pitches for the period 2006-11. Future needs are recommended to be assessed on a 3% compound growth rate to take account of future family formation.

Para 6.82 is unclear as to when and how pitches will be allocated in a DPD. To be consistent with Circular 1/2006 which states in para 33 that criteria must not be used as an alternative to site allocations. As it stands the core strategy seems to be unsound because it does not reflect this aspect of 1/2006.

## 2. Criteria in Policy CP11

In our view several of the criteria are ineffective because they are so tightly drawn that there will be little chance of suitable and affordable sites being available.

Criterion a) requires site to be accessible by foot, cycle or public transport. Circular 1/2006 is clear that for rural locations, which are acceptable in principle, local authorities should be realistic about alternatives to the car (para 54). Gypsies and Travellers are unlikely to be able to find affordable sites in line with the proposed criterion because they will be in competition with housing developers for land. Hence they will have no other option than to seek land outside of development envelopes.

Criteria d, f and g require that sites shall not harm character and appearance, have no harmful impact on amenities of neighbouring properties and have no adverse impact on protected habitats and species, nationally recognised designations and natural resources.

All of these criteria are capable of being interpreted so as to rule out almost any potential site because of perceived harm. They go further than the advice contained in circular 1/2006 intends.

Almost any site could be held to cause harm or have an adverse impact. It opens the door to NIMBY objections. As with all planning issues there is a balance to be struck between harm and utility and planning authorities should balance the level of impact against needs for sites. These criteria taken together will in our view be ineffective and are not justified.

**Change sought to make sound:** 1. Para 6.81/2 should refer to the RSS and indicate the identified level of need (19 residential pitches and 20 transit pitches to 2011 with an annual increase of 3% compound for residential pitches thereafter). This will ensure conformity with the RSS and the requirements of Circular 1/2006. In our view these paragraphs should also include a commitment by the council to allocate pitches to meet these needs in a specified DPD. This will ensure conformity with para 33 of Circular 1/2206.

### 2. Policy CP11

Criterion a) - replace with 'local community services and facilities are reasonably accessible.' This will ensure that this criterion is effective in helping to deliver needed sites.

Criterion d) - insert the word 'unacceptably' before the word harm. This will help make this criterion effective in helping deliver sites in suitable and affordable locations.

Criterion f) - insert the word 'unacceptably' before the word 'adverse'

These changes will help ensure that the policy is sound, effective and justified.

### **Representation (legal compliance):**

#### **Change sought to make legally compliant:**

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**Reference:** 184\7

**Respondent:** Persimmon Special Projects

**Representation (soundness):** Persimmon Special Projects considers Policy CP11 is contrary to Government Policy and consequently is not effective.

Circular 01/06 requires Policies to be fair, reasonable, realistic and effective in delivering sites. The criteria in Policy CP11 are similar to those in the existing Local Plan Policy HG16, which has failed to deliver any sites. In our view, the principal reason for this is that both Policies fail to include the test in Paragraph 35 of Circular 01/06 that one of the site search criteria should include an assessment of publically owned land. That is because unless private land is owned and being promoted by gypsies and travellers, it is unlikely to be available and deliverable, whereas the Authority can actively deliver publically owned land.

**Change sought to make sound:** The Policy needs to include a requirement firstly, to assess publically owned land in order to accord with Circular 01/06.

### **Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 239\19

**Respondent:** Keynsham Civic Society

**Representation** Whilst supporting the need for sites for gypsies and travellers, suggest an additional criterion of '**(soundness):** avoiding Green Belt land'.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 241\2 S

**Respondent:** Priddy Parish Council

**Representation** Both the rural development strategy and the policy regarding gypsy and traveller sites are important to **(soundness):** us where our parish abuts BANES. We considered these policies to be acceptable to Priddy Parish Council.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 246\9 S

**Respondent:** Combe Hay Parish Council

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

34.Gypsies, Travellers and Travelling Show People.  
Page 124 paragraphs 6.81 and 6.82  
Page 125 Policy CP11

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 258\1

**Respondent:** Travelling Boat Dwellers

**Representation** I am a travelling boat dweller and a member of the British Waterways (BW) Local Mooring Strategy **(soundness):** Steering Group for the Western Kennet and Avon canal. I am concerned that the rights and needs of boat dwellers have not been considered in the Core Strategy currently being drafted by Bath and NE Somerset Council and I wish the Core Strategy to address the issues I raise in this briefing. In addition I am concerned that both British Waterways and the Valley Parishes Alliance are lobbying to get policies included in the Core Strategy that would result in boat dwellers becoming homeless. I seek an assurance that this will not be allowed to happen, as there should be no policy that will result in people becoming homeless.

Housing and Homelessness

One of the most important things to understand from the outset is that people who live on boats have a home. This home is their boat. Understanding this is central to understanding the concerns that people living on boats have about the proposed changes to mooring policy on the Kennet and Avon canal (and other BW waterways). Liveaboard boaters are concerned that BW and the Valley Parishes Alliance want measures written into the Core Strategy that would make boat dwellers homeless.

#### Travelling boat dwellers and the 2004 Housing Act

The Department for Communities and Local Government (DCLG) ruled in April 2009 that 'bargee travellers', that is, travelling boat dwellers without a permanent residential mooring, are covered by Section 225 of the Housing Act 2004 which defines who is a traveller. This is legally binding, in other words it places a statutory obligation on BW or a local authority.

I understand that B&NES is to include boat dwellers in its future Gypsy and Traveller Accommodation Assessments (GTAAs). There is currently no reliable figure for the exact number of boat dwellers. All policies drawn up by B&NES must therefore be consistent with Section 225 of the 2004 Housing Act and must not result in homelessness for travelling boat dwellers. The current needs of travelling boat dwellers in B&NES relation to Section 225 are that we need BW to adhere to the law and to drop unlawful enforcement activity and unlawful new rules proposed through the Local Mooring Strategy and we need the assistance of the local authority in ensuring that our legal rights to follow the cruising pattern of our choice, subject to the 14-day rule, are upheld.

The DCLG guide of May 2007, Local authorities and Gypsies and Travellers: a guide to responsibilities and powers states regarding Section 225 of the 2004 Housing Act that: "the system will work as follows: the Housing Act 2004 requires local authorities to assess the need for Gypsy and Traveller accommodation in their areas at the same time as they assess the housing requirements of the rest of the population. Local authorities must then develop a strategy which addresses the need arising from the accommodation assessment, through public or private provision... The duty to conduct accommodation assessments came into force on 2 January 2007... As elected members, local councillors have a duty to represent the interests of resident Gypsies and Travellers as well as the settled community."

We believe this means that, at the very least, local authorities should be working with BW (and other navigation authorities such as the EA and Broads Authority) to ensure the adequate provision of 14-day moorings - the bargee traveller's equivalent of a transit site - rather than acting with BW on local mooring strategy groups to reduce the amount of 14-day mooring space. It is in the councils' interests to address our concerns, because reducing this mooring space will result in boaters becoming homeless and becoming a burden on council services whereas at present we are self sufficient.

#### The Human Rights Act

Through the Human Rights Act, Article 8 of the European Convention on Human Rights entitles everyone in the UK to respect for their home, family and private life. This includes the homes (ie the boats) of people who live on boats. Interference with one's home is a violation of these rights and is viewed as a very serious matter by the European Court (see for example *Kay and others v UK* 2010). Local authority policies must comply with the Human Rights Act.

#### Changes in mooring policy proposed by BW through the Local Mooring Strategy

The new policies proposed by BW are designed to implement changes which are inconsistent with the 1995 Act, for example charging for overstaying, non-return policy and no renewal of the annual boat licence unless any overstaying charges are paid to BW. The sanctions for non-compliance in any of these new policy areas is ultimately the removal of the licence, which in turn could lead to a seizure of the boat and result in homelessness.

The non-return policy and the other changes such as reducing the amount of 14-day mooring space proposed by BW means that boat dwellers without moorings will be compelled to travel much further than the 1995 British Waterways Act requires of them. This ignores the fact that many residents have jobs and many children are enrolled in local schools. The non-return policy and possible reduction in 14-day mooring space will present travelling boat dwellers with an impossible choice between the threat of losing their boat licence and therefore their home, and staying in employment or maintaining their children's education.

#### Costs to the local authority

Any increase in homelessness caused by the change in BW mooring policies will place increased pressure on social housing and other associated welfare benefits, particularly housing benefit. It could also lead to an increase in claims for jobseekers' allowance for those who remain on their boats but comply with mooring rules that take them too far away from their workplace to be able to travel to work. The local authority should realise the potential financial implications of the proposals and unlawful enforcement by BW, as well as social and economic costs.

The immediate priorities and demands of travelling boat dwellers.

6.The Core Strategy should not result in any decrease in the rights of boat dwellers .

7.The Core Strategy should comply with Article.8 of the Human Rights Act with regard to travelling boat dwellers and recognise that the “progressive journey approach” is contrary to this.

8.The Core Strategy should be compliant with the 2010 Equalities Act and deliver the obligations identified in S.255 of the Housing Act 2004 with regard to travelling boat dwellers.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 314\2

**Respondent:** Helen Woodley

**Representation** The policy as drafted is almost designed NOT to deliver and is thus ineffective and unsound. An

**(soundness):** indicator measure is included, of net additional gypsy & traveller pitches provided annually and since 2006, but no quantification of objective on the lines of at least x pitches before (say) 2015. This is inconsistent with other housing objectives.

I note that the DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. This is essential. But the Local Plan inspector in 2006 noted the need for urgency, and I think that should be incorporated into the Core Strategy itself.

Ref: my consultation comment 2993

**Change sought to** There should be:

**make sound:** a quantification of objective

a timescale for implementation

assurance of inclusion of sites in the placemaking plan.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 6.83**

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**Reference:** 264\15

**Respondent:** Englishcombe Parish Council

**Representation** This parish council fully supports the aims and objectives of Policy 6e together with the supporting

**(soundness):** Economic Strategy for B&NES 2010 – 2026, but feels that it falls short in specific proposals to attract the high value businesses to come to Bath and the adjoining towns.

There need to be specific incentives especially for new start-up enterprises both Commercial and “ Industrial” (in all its guises hi-tech, low tech and everything in-between), making it easy and attractive to locate in the B&NES area.

With its Universities Bath should be producing people with ideas and ambitions for start-up businesses. It would benefit Bath and its economy for them to stay in Bath.

(Continue on a separate sheet if necessary)

**Change sought to make sound:** In the same way as there are proposals for "Affordable Housing", the Core Strategy should contain similar proposals for Commercial and Industrial premises to encourage small and start-up businesses.

Such proposals as:

- A proportion of new and attractive, eco-friendly commercial and Industrial builds being Starter Units
- Premises should be made available on flexible leases to allow for easy expansion or contraction with consideration being given to a lease 'holiday' for the initial period
- Enterprise Zone type incentives, with scaled business rates over 3 - 5 year period.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 286\5

**Respondent:** Horseworld

**Representation (soundness):** Paragraph 6.83 of the Core Strategy states that the recent recession has "served to remind us that it is in everybody's interest to support the development and growth of a prosperous economy across BANES".

Paragraph 6.85 then recognises that the district's economy is dominated by micro and small businesses which reflect an entrepreneurial spirit. It further notes that the district has more residents educated to degree level than the national average and is "therefore well equipped to take up job opportunities locally, should they be created".

Whilst the Core Strategies aim to build on the economic strengths of the district are supported the proposal to follow a 'smart growth' agenda seems to place the growth prospects of the whole district on the micro and small businesses sectors. What the Core Strategy seems to fail to recognise is that such activity, is by its very nature, limited in its extent and that those businesses can choose to relocate away from BANES at a relatively short notice and with relative ease. The whole 'smart growth' agenda is based on achieving fundamental shift in economic development which has not been achieved in BANES thus far despite a recent history of unprecedented growth and prosperity. Furthermore, there is no evidence to suggest that the growth in the micro and small business sector will continue at current levels.

The BANES Core Strategy appears to be founded on an economic strategy which is inflexible and based on a growth strategy which requires significant intervention by the public and private sector - there is no indication of how those interventions will be achieved and therefore the strategy cannot be considered to be valid and the deliverability of the strategy must therefore be in doubt. Such doubts therefore equally risk the housing growth strategy which is apparently based on the expected additional jobs coming into the District. It is considered that the short sighted housing I employment strategy which limits development to Brownfield sites will actually hinder the future ability of the district to provide facilities should new businesses decide to relocate to BANES. The Core Strategy is fundamentally flawed and unsound because it is not flexible, does not provide adequate contingency and is reliant on interventions by the public and private sector which are inadequately identified, and unproven. Moreover, the housing and employment figures are not based on a realistic assessment of future growth but are based on an ideological attempt to avoid all development on Greenfield land.

**Change sought to make sound:** Allow for a more flexible approach to the delivery of housing and employment land.

**make sound:** Accept the need for development of Greenfield land to meet the existing and future needs of the resident population.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 6.84

**Reference:** 248\14

**Respondent:** Crest Strategic Projects and Key Properties Ltd

**Representation** 1) RPS does not understand the purpose or value of this section. There is no policy to back up the ‘**(soundness):** sentiment’. Certainly the sentiment confirms earlier assumptions regarding the extent to which BANES has no regard to wider sub-regional issues. Paragraph 6.86 wants to commit to less overall commuting but provides no clarity on how that might be achieved. How the Council intend to achieve that in areas such as the Somer Valley where significant levels of out-commuting already exist; this CS seeks to propose 2,700 new homes against 1,000 new jobs. Quite clearly, the position is only going to worsen.  
2) It would be helpful if this section made clear precisely what level of economic growth the district is planning for. It is notable that it is conspicuous by its absence. Is the Council ashamed that it is only planning for low growth over a 20 year period because of a recession in the early years? It should be, and by not making it explicit is to mislead the public.  
3) Paragraph 6.82 states that the CS will support and deliver ‘elements’ of the Economic Strategy. What elements does it not support? Why? Where is the justification?  
4) The pie charts showing how the economy will look in 2026 is based on what? An aspiration? Is there any evidence reflecting how the economy will change and what initiatives are in place?  
5) This section of the CS provides no clue as to how economic growth will be delivered (no matter how low).  
6) The sooner this CS recognises that it is not planning for an island, the sooner there may be some realistic prospects for economic growth that will benefit existing and future residents. The aim should be to reduce in and out commuting to the West of England sub-region to deliver a more appropriate response to a prosperous economy.

**Change sought to make sound:** 1) Section 6e should either be deleted or comprehensively reassessed to provide an honest assessment of what this Core Strategy will deliver, accompanied by a policy which can then be monitored. This is a CS that has no interest in securing economic growth beyond what is being achieved coming out of a recession. It is thoroughly misleading to suggest otherwise.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 277\6

**Respondent:** Ashtenne Industrial Fund Limited Partnership

**Representation** 6e – A Prosperous Economy

**(soundness):**

Ashtenne acknowledges the text within section 6e, which seeks to ensure a prosperous economy in Bath. Ashtenne notes the objective to have a more environmentally sustainable economy, including a reduction in the contribution made by commerce and industry to the carbon footprint of the area. It should be noted that the environmental performance of the buildings at Wansdyke is extremely poor due to the age and building technology of the existing buildings. It would require considerably investment to improve their performance retrospectively.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 6.86

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**Reference:** 311\4

**Respondent:** Parish Council's Airport Association

**Representation** Effect of airport expansion. The proposed expansion of Bristol airport will impact on these aspects of **(soundness):** the Bath & NES Core Strategy. First the expansion would be expected to provide some new jobs and some, at least, of these might be filled by Bath & NES residents. However, the number of such new jobs is likely to be small, perhaps between 800 -900 jobs over a 10 year period, and will tend to be and low paid.

It is often imagined that expansion of the airport will stimulate local businesses, and so the local economy. The problem with this argument is that Bristol is an airport which overwhelmingly caters for the outgoing tourist trade, indeed a Civil Aviation Authority report suggested that business use of Bristol airport would drop from 13.3% to 9.6% in 2020. The airport already provided good "connectivity" for business use, and expansion will make little difference to this.

Bath & NES hopes to develop tourism in its district, and surely some tourists must come via Bristol airport. However, both locally at Bristol and nationally vastly more British tourists fly out of the country spending their holiday money abroad than overseas tourists fly in. This outward "tourist deficit" (as it is known) has grown nationally to £17 billion in 2009 and at Bristol is predicted to grow from £600 million a year in 2009 to £1 billion in 2030, should the expansion plans be realised.

The enormous expansion of aviation in recent years, largely based on very cheap flights possible because of large government subsidies to the aviation industry (tax exemptions and so forth), has essentially exported large amounts of holiday tourism: money is spent in Biarritz and Barcelona, rather than in Bath and Somerset, or the South West of England in general.

The expansion of Bristol airport is bound to make the increased employment from tourism in Bath & NES, hoped for in the Draft Core Strategy, particularly difficult to attain.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 6.90**

**Reference:** 139\2

**Respondent:** London Road and Snow Hill Partnership

**Representation** I believe the Core Strategy takes too narrow a view of the problems faced in the London Road area. In  
**(soundness):** 6.90 London Road is mentioned in the context of retailing where the document notes that London Road is a "declining area". It could be argued that the area declined some forty years ago, and has not been given to opportunity to revive. Planning and economic policy have allowed shops to be turned into flats that are no longer desirable or even viable. Council owned properties in the area have been allowed to fall derelict, adding to the air of decline.

The core Strategy recommends "consolidating and strengthening the retail role..." This is too narrow a view of what is needed.

6.91 refers to the protection of shops within the area, whilst 6.92 seems to attempt some connexion between the Southgate development and the demand for retailing space in other parts of the city. Let's start by accepting that an entrepreneur does not ask: "Shall we open in Southgate or on the London Road.....?"

**Change sought to make sound:** May I suggest that we stop talking about retail as though it is the only possible or viable activity on the London Road, or anywhere else for that matter. The Strategy Document needs to take a wider view of creating employment in the suburbs and in what you call local Shopping Centres. Perhaps we could free ourselves of the trap if we call these centres: Areas of Employment or areas of economic activity.....of which retailing will be one, perhaps important, aspect.  
The Document does refer to "supporting business development" So why not use this concept more broadly? There is a recognised shortage of space for new and micro business other than retailing. Why not allow underused premises on the London road to be used for employment other than retailing?  
To give a recent example. A vet applied for planning permission to open a surgery on London Road. The application was blocked because the surgery was not a "Shop" as defined. After support from



elected representatives and the local community, planning permission was given, and more than 400 customers registered at the new business in the first three months!

The Core strategy should contain more about honing policies congruent to local needs as expressed by the community.

The London Road is an ideal location for the establishment of a Local Development Area.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Policy CP12: Centres and Retailing**

**Reference:** 5\1

**Respondent:** Barclays Bank PLC

**Representation (soundness):** The current Core Strategy document notes the District's strengths but recognises the need for change to tackle economic and social challenges. It acknowledges the need for changes in employment and work practices and shifts in work / life balance, together with the recognition that an evolving economy will mean considerable changes over the coming years. It states that the economy will have to be more diverse, productive and resilient to meet the needs of the 21st Century and be able to attract inward investment (Section 1) Objective 3 sets out to encourage economic development, diversification and prosperity and Objective 4 has a clear intention to invest in city, town and local centres. These are laudable aims but words and phrases like "change", "diverse", "evolving", and "meeting 21st Century needs" ring rather hollow in the face of an apparent dogged determination to retain some prescriptive and inflexible planning policies. Under "Strategic Issues" the document states that "Bath's prosperity depends on enabling the growth of existing business, attracting high value employers and jobs [and] it will have to compete with other cities and large towns also wishing to attract growing sectors" It then lists several requirements thought necessary to achieve this but in the Bank's view there is a glaring omission from that list; namely the need to change outdated and outmoded planning policies. Policy B1 seeks to enhance the reputation of the City Centre and Policy B2 sets out the apparent means of doing so. "Change" is the key to the aim of creating "a more dynamic place for business, enterprise, creativity and innovation" (1c). One of the "Placemaking Principles" is "The prevalence of active street frontages" (2j) and the "Risks to the Central Area" identifies a decline in the presence of independent and local retailers (2r) and concern about impeding economic growth and diversification (2v). Such concerns suggest that the Council's planning policies relating to the town centre are part of the problem. Section 6 of the Core Strategy states that its policies "will guide the content of other policies in the Local Development Framework such as the Placemaking Plan" (6.01). Under the title "A Prosperous Economy" there is a recognised need for "a more diverse, productive and resilient economy" (6.83) and a "need for change" (6.84) yet the Council is apparently persisting with an out-of-date approach by retaining Local Plan Policy S5 that arbitrarily restricts non-A1 uses in primary frontages (6.91). Core Policy CP12 refers to the Council's intention to review retail frontages in the "Placemaking Plan" but there is apparently no intention to examine the effects of, or review the policy that pertains to them. On the matter of policy formulation PPS12 is clear that all DPDs must be:

- "founded on a robust and credible evidence base";
- "the most appropriate strategy when considered against the reasonable alternatives"; and must be
- "consistent with national policy". In our previous representations we noted that keeping significant generators of footfall out of primary frontages will actively work against the achievement of the Council's strategic objectives and is inconsistent with national policy.

We urged the Council to recognise the positive impact that financial service retailers such as the Bank have upon vitality and viability. The production of the LDF provides an opportunity to examine new evidence and to revise out-of-date policy, particularly if it is not consistent with national policy. Limiting certain Part A uses in the primary frontage undermines the Council's intention to attract private sector investment in the town centre. The implication that only A1 uses are appropriate derives from very outmoded and discredited thinking that other uses such as banks detract from the vitality and viability of town centres. By definition, uses that fall within Part A of the Use Classes Order are appropriate in town centres as they are "shopping area uses" and are acceptable without any need for restriction or

qualification. This is particularly the case for the financial services sector. ODPM Circular 03/2005 "Changes of Use of Buildings And Land" which accompanied the last major revisions to the Use Classes Order specifically states in relation to the A2 Financial and Professional Services use class (which was created to separate those uses "serving the public, from other office uses not directly serving the public" - paragraph 32), that the Class is also "designed to allow flexibility within a sector which is very much a part of the established shopping street scene, and which is expanding and diversifying". The uses within Class A2 are noted as being those "which the public now expects to find in shopping areas" (paragraph 38). The wider role played by town centres than a pure shopping function is recognised throughout Government policy on town centres.

Government Policy in PPS4 "Planning for Sustainable Economic Growth" continues the thrust of policy in PPS6 relating to town centres but particularly emphasises the importance of economic growth. Policy EC3.1c states that Planning Authorities should: "at the local level, define the extent of the centre and the primary shopping area in their Adopted Proposals Map", following consideration of whether there is evidence of a need to designate "realistically defined primary and secondary frontages in designated centres". The strong emphasis upon the promotion of town centre vitality and viability remains in the current PPS and the Government is clear that there should be a positive attitude towards all development

which generates wealth and creates employment. The "over-arching objective is sustainable economic growth" (paragraph 9). The Government wants economic growth to be focused in town centres offering "a wide range of services to communities in an attractive and safe environment and remedying deficiencies in provision in areas with poor access to facilities".

There should be "enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres" (paragraph 10). Policy EC10.1 states that: "Local planning authorities should adopt a positive and constructive approach towards planning applications for economic development. Planning applications that secure sustainable economic growth should be treated favourably". There is nothing in Government policy that recommends or supports imposing restrictions upon acceptable town centre uses at all and indeed Policy EC3.1 states that local planning authorities should "set flexible policies for their centres which are able to respond to changing economic circumstances ...". It is therefore essential that DPD policies should facilitate the positive approach required by PPS4.

Promoting vitality and viability in town centres are objectives of the Government and the Council. To succeed, town centres need to provide a full range of services and these often need to be located in ground floor premises in accessible locations. Indeed, Class A2 retailers such as the Bank routinely experience very high levels of customer visitation, contributing significantly towards pedestrian movement and therefore the vitality and viability of town centres. The Bank has undertaken a number of comparative footfall surveys in connection with its current acquisitions programme at its branches in various towns and cities in the UK (copies are attached). These conclusively show that the level of footfall associated with Bank branches is commensurate with, and often higher than, the best known national multiple Class A1 traders. Banks also have moved away from the traditional style of frontage, preferring to have an open, visually interesting and attractive face to the 'high street'. The Bank has become increasingly retail in its presentation and has introduced an innovative 'flagship' branch design, which has been developed in association with its customers, to transform banking into what it terms as "a retail focused experience". The Bank estimates that some 10 million customers use its branches each week and through listening to their feedback, a design has been developed that meets their requirements for modern banking and provides branches similar in appearance and in operation to retail shops. This is an example of the "enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres" that PPS4 expects and to which the Core Strategy (and other DPDs) must also positively respond. Whilst the design of every new branch has to be flexible in order to be sensitive to the requirements of each building occupied, the aim is generally to ensure that over 70% of the internal space at ground floor is accessible to customers. The Bank's managers regularly report that upon the opening of a 'flagship' branch the customer visitation levels significantly increase and thus the level of activity helps to underpin pedestrian flows to the benefit of surrounding traders. It is therefore important that planning

policy recognises the benefit of bank uses in fostering footfall and pedestrian activity and that it should not resist much-needed investment by financial service retailers.

The Bank's footfall surveys have been a key element in helping to change attitudes towards the presence of banks in core shopping areas and primary frontages. Even planning authorities that once strongly resisted Class A2 uses in their primary areas have granted permission for Barclays 'flagship' outlets. Examples of authorities that have recognised the wider benefits of the 'flagship' design (following receipt of applications which have been supported by evidence of high footfall), include Southampton, Reading, Manchester, Milton Keynes, Romford, Southend, Leicester, Plymouth, Sheffield, Kensington & Chelsea and Cambridge. Follow up surveys were carried out in 2010 at Milton Keynes, Southend, Reading and Southampton (copies are attached). In every case the new 'flagship' branch significantly increased footfall, confirming the Bank's beneficial effect on vitality and viability.

The Core Strategy's objectives will require major commitment and substantial investment by the private sector. Pursuing restrictive policies to keep significant generators of footfall such as the Bank out of primary shopping frontages will actively work against the achievement of those objectives and is an outdated and discredited approach. The Bank therefore considers that the omission of any intention to review such policies renders Policy CP12 'unsound' as it is neither consistent with National Policy nor Justified. The Council has provided no robust and credible evidence to justify the arbitrary restriction of financial service retailers in shopping frontages and furthermore has not given consideration to reasonable alternative strategies.

### 3. Closing Comments

The Council recognises the need for significant private sector investment in the town centre so the opportunity provided by the preparation of the main elements of the LDF should be used to give greater encouragement to appropriate Part A uses to invest and to improve the quality of their representation. The Bank's evidence of how it increases vitality and viability in primary frontages shows that there is considerable benefit in seeking to attract those A2 users such as banks who provide a high level of investment in and maintenance of their premises, resulting in active and attractive street frontages. This will foster very significant footfall and pedestrian activity and attract investment by others, helping to provide the confidence and commercial viability necessary for any programme of regeneration and investment. Pursuing restrictive policies to keep significant generators of footfall out of primary shopping areas will actively work against the achievement of the Council's strategic objectives and is inconsistent with national policy. In fact there is nothing in Government policy that recommends or supports imposing constraints upon acceptable town centre uses at all. Any continuation of historic primary frontage policy is unjustified by robust and credible evidence and the Council has provided no explanation for the decisions it has taken about the most appropriate strategy to follow when considered against the reasonable alternatives.

The Council's documents show no indication that it has gone through an objective process and audit trail of assessing alternatives, or indeed that alternatives have even been considered at all. The Council's present attitude to A2 retail uses in designated shopping frontages is neither Justified nor Consistent with National Policy so the Bank therefore objects to the omission from Core Strategy CP12 of any intention to review Local Plan Policy on Primary Shopping Frontages as this is unsound. This Policy should be rewritten to make clear that financial services retailers such as the Bank are appropriate in all designated shopping frontages, without restriction and that this will be reflected in the subsequent "Placemaking Plan" DPD.

In view of the requirement for improved provision of banking services in Bath and North East Somerset the Bank would like to confirm its continued interest in the LDF process and in that regard we shall be grateful if the Council will continue to notify us of the progress of the submitted document as well as details of any other emerging LDDs.

**Change sought to** The Core Strategy is setting the direction for subsequent DPDs such as the "Placemaking Plan" so Policy **make sound:** CP12 should set out a clear intention to review Local Plan Policy S5 as it is unjustified, and is

unsupported by any evidence.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 102\21 S

**Respondent:** Federation of Bath Residents' Associations

**Representation** Policy CP12 (p128)(Centres and retailing), also Paras 2.23, 6.89 and Table 4

**(soundness):** FoBRA supports this policy, though it is entirely reactive, and should be made sharper:

- Para 6.89 is correct that some centres hardly cater for everyday (eg Lansdown Road).
- In many cases, shops have been replaced by take-aways, either licensed or unlicensed, which arguably create vitality, but can become a focus for antisocial behaviour in the evening, and yet such a change of use would be consistent with the policy.
- Local centres have declined because people shop elsewhere (in the London Road one would inevitably shop in Morrisons).
- The 'use them or lose them' principle also applies to pubs, which don't seem to be covered by the Core Strategy.
- Once the Rossiter Road scheme is implemented in Widcombe, vacant premises are expected quickly to be let and rental levels to rise due to increased demand

Secondly, although concerns in this area are real, they are not easily addressed by the town and country planning system, since changes between various kinds of retail outlet are not "material changes of use" and this problem is exacerbated by the Town and Country Planning Use Classes Order. However, B&NES might instead use its landlord powers in Bath city centre, where it has a controlling interest in a high proportion of the stores, to encourage the spread and retention of specialist shops, particularly of high-value and luxury goods, thus reinforcing the magic which attracts shoppers.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 132\4

**Respondent:** The Southgate Limited Partnership

**Representation** Our Client supports the identified importance of centres, with Bath City Centre being supported as the

**(soundness):** top of the hierarchy and the focus for development. The policy encourages uses which contribute to maintaining the vitality, viability and diversity of centres, which is supported by our Client, however it does not provide clear guidance as to the scale of development that each centre can or should support as it is informed by an out of date retail study which has not taken into account the new retail space provided at SouthGate. A policy without clear guidance has the potential to allow development that will unacceptably impact on the vitality and viability of other centres and in particular threaten the primary shopping areas in the City Centre. We would welcome the opportunity to comment further when the new retail study is completed and this policy is refined.

In the interim, we would suggest policy CP12 contains a further clause 'c' as follows: "Retail development within the centres listed within the hierarchy and defined on the Proposals Map will be permitted where it is:

a Of a scale and type consistent with the existing retail function and character of the centre; and  
b Well integrated into the existing pattern of the centre; and.

C Does not threaten the vitality and viability of other existing established centres Any additional comparison retail provision within Bath should be provided to serve identified local needs and be of an appropriate scale, consistent with the requirements of national guidance in PPS4 policy EC1.4, which requires LPA's to assess the qualitative and quantitative retail needs of an area before permitting retail developments.

The function of SouthGate needs to be established and Bath's status as a regional retail destination

secured. This must not be threatened by further comparison retail proposals being permitted in inappropriate and unjustified locations.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 147\12

**Respondent:** Bath Green Party

**Representation (soundness):** A prosperous economy must be a sustainable one. The basis of a resilient and sustainable local economy must be a diverse economy that produces as full a range possible of local goods for local use and provides services for them. It must also become zero-carbon, and in the short term the economy should be strongly involved in the move to becoming zero carbon. PPS1 applies to this section, as it does to all sections “KEY PLANNING OBJECTIVES . To deliver sustainable development, and in doing so a full and appropriate response on climate change”. We agree with “Well-integrated mixed use would actively assist in creating self contained (resilient) sustainable communities and the provision of LOCAL services is key”. An important part of a sustainable local economy is farming and the local production of food for local use.

Missing from this section is any mention of out of town shopping centres. These should be prohibited, as well as ribbon development of large-scale retail stores. We agree that developments should be in and around community centres. Manufacturing sites must be made available in urban areas for the local economy as described above. All of this will work towards removing the need for reliance on private motor cars.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 166\2 S

**Respondent:** Sainsbury's Supermarkets Ltd

**Representation (soundness):** Policy CP12 seeks to direct retail development of an appropriate scale and type to the defined centres, or where appropriate, adjoining the centres in the identified hierarchy. This policy is sound and in accordance with national policy set out in PPS4 ‘Planning for Sustainable Economic Development’. It is noted that the supporting text to the policy refers to PPS4 as a material consideration informing decisions on specific proposals. PPS4 will be an important material consideration in assessing proposals for out-of-centre retail development as such development falls outside the scope of Policy CP12.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 223\4

**Respondent:** Transition Bath Food Group

**Representation (soundness):** Despite the emphasis placed on the importance of agriculture for economic security and growth in both the rural areas and the district as a whole, agriculture is not properly addressed in Section 6e, A Prosperous Economy.

There appears to have been little attempt to collect the same level of evidence for agriculture as there has been for the two other aspects of B&NES economy: tourism and retailing, both of which have been supported by recently commissioned reports. The most recent evidence collected by B&NES on the

potential for increased local agricultural production and retailing appear to be the studies done by Sustain in 2007 and it is not clear what use, if any, has been made of this work. The BANES [sic] Business Growth & Employment Land Study lumps together employment in agriculture and extraction as if these were equivalent; agriculture and food processing are a viable source of increased employment. The Economic Strategy for Bath & North East Somerset 2010-2026 does not mention agriculture; it does refer to the importance of local food production but the quantitative data lumps accommodation and food together, thereby defining the food sector solely in relation to tourism and large-scale retail, rather than to local production and sale. In Diagram 21, a pie-chart of the economy in 2026, agriculture is not even listed.

The Retail Strategy Report (December 2008) contains a number of recommendations about demand for local food. It states that Bath has an above-average proportion of “urban intelligence” consumers, who are “enthusiastic about organic, home-produced and local produce”. It notes that the trend in food retailing is towards organic produce from smaller, local suppliers, and that consumers are increasingly aware of ethical issues, “turning to alternative food distribution channels such as farmers markets, concerned by the tremendous power of large retail chains”. It notes an increase in purchasing through independent shops, farm shops, farmers markets and box schemes “despite the dominance of supermarkets”. On the one hand, the report notes the increase in demand for ethical purchasing and it recommends that independent retailing should be encouraged and, on the other, it identifies Bath’s retail weakness as “a lack of mass market retailers” and recommends a number of retail multiples which it considers B&NES should endeavour to attract.

Policy B2, Strategic Policy for central Bath, includes the objective of increasing “small to medium sized comparison retail development” and “2,000 sq.m. of convenience shopping space”. While community shops are encouraged for the rural areas, it seems that the local areas in the city are already - and will remain - dominated by the supermarket multiples, displacing the small independent shops which are a real ‘convenience’ for local people. The food miles generated by the supermarkets’ distribution systems and their inability to adapt to sourcing fresh, local food contrast with the possibilities of local food being sold locally, an aspiration in the Core Strategy but one which does not appear in section 6e. The Core Strategy states that an updated retail study will be undertaken. We recommend that its terms of reference require more localised, environmentally sustainable retail concepts than the conventional supermarket/shopping mall approach.

**Change sought to make sound:** Too many local corner shops, at the centre of local communities, have disappeared and Policy CP12 does not encourage their return. To provide outlets for locally produced food and to avoid the homogeneity of multiples, the following changes should be made to Policy CP12:

Retail development within the centres listed within the hierarchy and defined on the Proposals Map will only be permitted where it is of a scale and type which enhance the vitality, diversity and character of the centre.

Uses which contribute to the environmental viability of centres will be encouraged, with greater support given to shops selling local food, local products, and those providing repair and recycling services.

#### **Representation (legal compliance):**

#### **Change sought to make legally compliant:**

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**Reference:** 224\59

**Respondent:** Bath Preservation Trust

**Representation (soundness):** We welcome the commitment in paragraph 6.90 to take forward work on regenerating London Road and enhancing its appearance. We note that the CS sets out Placemaking Principles for most of the areas identified as requiring regeneration, but not for London Road (or for other Bath neighbourhoods including the MoD sites – see our comments on Section 2d. Clarification is needed on how these areas will be dealt with in the Placemaking Plan.

There are discrepancies between the list of local centres on page 128 and the list in Table 4 of Section 2d. The two lists need to be reconciled.

**Change sought to make sound:** Reconciliation of the list of local centres in CP 12 with the list in table 4.

Clarification of placemaking principles for areas such as London Road.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 227\14

**Respondent:** London Road Area Residents Association

**Representation** Mindful of PPS 4 & PPS 5, we oppose the inappropriate conversion of shops into flats where (para 6.91)

**(soundness):** Local Plan Policies S.5 and S.8 have failed.

This has already occurred in several properties along London Road even though representations were made.

**Change sought to make sound:** Allow non-viable retailing premises to change their designation to 'places of employment' ie offices and workshops as needed by Creative, Technology and Software Business speakers at the recent 'Treasure and Transform Seminars on 19, 20, 21 January 2011 and as referred to in para 6.85 on page 126.

Listed buildings along London Road that are non-viable as 'shops' could readily fill such a need, thus contributing to the Regeneration of the Georgian Entry to Bath.

We support para 6.90 and hope that para 6.91 will not prevent such potentially enhancing change of use.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 243\1

**Respondent:** Chew Magna Parish Council

**Representation** Policy S1 from the B&NES Local Plan, which is replaced by Policy CP12, focussed on Shopping and made

**(soundness):** no reference to residential development.

It is therefore inappropriate for a village, such as Chew Magna, which is washed over by the Green Belt; does not have a high level of accessibility by public transport; and is not an RA1 village but which nevertheless remains a service centre providing retail and community facilities, to be included in this Policy when there is also a focus on/reference to higher density forms of residential development.

**Change sought to make sound:** Policy CP12 should focus on shopping centres and not make reference to residential development.

Remove from the Policy "Centres will also be the focus for higher density forms of residential development provided the centre is suitable for such development and has a high level of accessibility by public transport, cycling and walking"

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\23 S

**Respondent:** The Bath Society

**Representation** A Prosperous Economy 6e

**(soundness):** Wherever and whenever possible, and certainly in Bath, retail premises falling vacant should, as a priority, be considered for workspace for small businesses rather than for flats (see para 6.85 ) and we feel that Policy CP12 Centres and retailing should be amended to include this.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\24 S

**Respondent:** The Bath Society

**Representation (soundness):** We fully endorse what is said about the need for upgrading London Road as a 'declining centre' ( para 6.90).

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\25

**Respondent:** The Bath Society

**Representation (soundness):** Mindful of PPS 4 & PPS 5, we oppose the inappropriate conversion of shops into flats where (para 6.91) Local Plan Policies S.5 and S.8 have failed.

**Change sought to make sound:** Allow non-viable retailing premises to change to "places of employment" ie offices and workshops as needed by Creative, Technology and Software Business speakers at the recent 'Treasure and Transform Seminars on 19, 20, 21 January 2011 and as referred to in para 6.85 on page 126.  
We support para 6.90 and hope that para 6.91 will not prevent such potentially enhancing change of use.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 276\11

**Respondent:** Hignett Family Trust

**Representation (soundness):** Policy CP12 replaces policies S1 and S2 of the Local Plan . The Local Plan identified the particular circumstances of Bath which justified the provision of additional convenience shopping floorspace in the southern part of the densely-developed southern sector of the city where there is very little alternative provision at present.

The development at Hayesfield School playing fields was identified to fulfill that role as set out in policy S3. The development is now underway for a medium size ( 1800m2 ) Sainsbury supermarket which was supported by the 2009 Retail Strategy which recognized the shortfall of convenience shopping capacity in the southern half of the city.

The new store lies on the Frome Road to the east of the "Frome Road/Bloomfield Road (Odd Down)" local centre described in the CP12.

The scale and type of retail development at Hayesfield is clearly more than local needs/top up convenience store, however it is well situated to complement existing local centres such as at Odd Down, Combe Down, Southdown and Bear Flat. It transport links mean that it will serve a wide catchment around south Bath avoiding the need for more convenience shopping trips to the City Centre or to edge of centre supermarkets.

The role and significance of this new retail centre in South Bath should be recognized in policy CP12. The role of this location is clearly much more than a local centre and therefore the policy should be amended to include it under the definition of District Centre.

The purpose of Policy CP12 has developed to include not just retailing (S1 and S2) but other uses appropriate to a centre. The result is to encourage more sustainable patterns of development and efficiency of public transport usage around key centres of activity. The policy emphasizes the



importance of high levels of accessibility by public transport , walking and cycling and should be supported.

The Policy refers to defining the centres on the Proposals Map however the only reference to this relates to the Bath City Centre, Appendix 3 of the CS which amends the former on the Proposals Plan. The Hayesfield School Site should be identified on the Proposals Map as a Centre CP12. See reference HLT 2d Bath's Neighbourhood for further amendments. Further evidence will be provided to support case for a District Centre at Odd Down.

**Change sought to** Amend Policy CP12 Centres and retailing as follows:

**make sound:** - Add "Frome Rd ,Bath " to the list of District Centres.

- Amend the Proposals Map to delete reference to policy GDS.1 /B18 as this is now under development and replace with allocation of District Centre CP12 .

- Consider extending the boundary of the Centre on the Proposals Map to include other significant retail units along Frome Rd/ Bloomfield Rd and Frome Rd /Midford Rd all under the definition of Odd Down Centre.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 276\11

**Respondent:** Hignett Family Trust

**Representation** Policy CP12 replaces policies S1 and S2 of the Local Plan . The Local Plan identified the particular

**(soundness):** circumstances of Bath which justified the provision of additional convenience shopping floorspace in the southern part of the densely-developed southern sector of the city where there is very little alternative provision at present.

The development at Hayesfield School playing fields was identified to fulfill that role as set out in policy S3. The development is now underway for a medium size ( 1800m2 ) Sainsbury supermarket which was supported by the 2009 Retail Strategy which recognized the shortfall of convenience shopping capacity in the southern half of the city.

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The Policy refers to defining the centres on the Proposals Map however the only reference to this relates to the Bath City Centre, Appendix 3 of the CS which amends the former on the Proposals Plan. The Hayesfield School Site should be identified on the Proposals Map as a Centre CP12.

See reference HLT 2d Bath's Neighbourhood for further amendments.

Further evidence will be provided to support case for a District Centre at Odd Down.

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- Consider extending the boundary of the Centre on the Proposals Map to include other significant retail units along Frome Rd/ Bloomfield Rd and Frome Rd /Midford Rd all under the definition of Odd Down Centre.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 297\17 S

**Respondent:** Bath Rugby Club

**Representation** Page 128, Policy CP12

**(soundness):**

We support the reference to retail development, offices, leisure and tourism as being located within or, where appropriate, adjoining the centres in the identified hierarchy of centres. This will ensure that development is not restricted on appropriate and sustainable sites which are in close proximity to the centres.

**Change sought to**

**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 819\7

**Respondent:** Paulton Parish Council

**Representation** How do you intend to ensure that small business units and shopping outlets are occupied and not left

**(soundness):** empty for years, as is the current position in the centre of Paulton at present?

**Change sought to**

**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 820\4

**Respondent:** St James's Investments and Tesco UK Stores

**Representation** Our clients are broadly supportive of the overarching policy objective to direct new retail provision to

**(soundness):** the existing centres and the recognition that the Bath central area must be the focus for comparison goods retail as part of the multi-functional role of the city centre. Our clients also support the recognition and the acknowledged need for further convenience goods floor space in Bath.

The Core Strategy is over reliant on the 2008 Retail Strategy to inform the amount and type of new retail floor space required during the plan period and within specific policy areas. Paragraph 6.92 of the Core Strategy acknowledges the changes in circumstances that have occurred since the strategy was produced and the need for re-assessment.

**Change sought to** The Core Strategy should adopt a more flexible approach to the amount and type of new retail floor

**make sound:** space required, until an up-to-date retail strategy is in place.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 93\8 S

**Respondent:** Highways Agency

**Representation** The Agency supports the objective to reduce the need to travel.  
**(soundness):**

**Change sought to** The Council should state that major applications need to be supported by a robust Transport  
**make sound:** Assessment using guidance within the OfT's Guidance on Transport Assessment document (2007). Such assessments need to identify the impact of development on the Strategic Road Network in addition to the local highway network.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 98\1

**Respondent:** Mr Mark O'Sullivan

**Representation** The first is surface transport to Bristol (Lulsgate) Airport, a distance of about 18 miles, and a journey of  
**(soundness):** great importance to the small high-tech firms which are critical to Bath's economy. The Strategy makes much of the excellent communications of Bath, but in truth travelling to and from Lulsgate is difficult. All the road routes are congested, especially at the times of day when businesspeople need them. This does not just make the journey time-consuming: for a small airport with few daily flights to each destination, and in an era when business organisations are compelled to use non-refundable tickets for pre-booked flights, the journey to the airport on highly congested roads is either intolerably stressful or intolerably long. The only remedy advertised is to take the train to Bristol and an airport bus from there, but the bus must still travel 8 miles from Bristol to Lulsgate in Bristol's city traffic with little help from bus lanes; this saves no time and is almost as unpredictable as the direct road journey.

**Change sought to** The airport, however, is little more than two miles from the Bath/Bristol to Weston-super-Mare railway  
**make sound:** line, and the Strategy should include a commitment to use this link to improve the journey (an effective shuttle by taxi or bus from the existing Nailsea & Backwell station could be arranged very readily, and facilitated in due course by a new entrance to the airport from Downside Road; better shuttle solutions such as a maglev track might be explored in the longer term).

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 138\2 S

**Respondent:** Mr Christopher Isaac

**Representation** With respect to transport, the Council needs to support those initiatives that can make the car less  
**(soundness):** attractive and public transport, cycling and walking more attractive.

**Change sought to**  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 147\21

**Respondent:** Bath Green Party

**Representation** As with other sections, the priority for this section should be the urgent reduction of CO2 emissions.  
**(soundness):** This must include giving priority to ensuring all areas are safe and accessible by foot and developing safe cycling routes, and should include a specific policy on changing the urban speed limit to a maximum of 20mph, with slower speeds where necessary.

We oppose expanding the number of Park and Ride sites or their size and we also oppose the building

of the South Bristol Ring Road, as both these measures will encourage greater car use and facilitate longer journeys. Parking provision and management policies must have REDUCING car use as their main objective. This policy also needs to recognise that B&NES should join a regional integrated transport authority.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 227\4

**Respondent:** London Road Area Residents Association

**Representation** Para 6.93 There is no specific mention of railways in the list.

**(soundness):**

Para 6.94 There is no justification at all for the inclusion of “The Council ...and recognises the need for studies to assess .... An A46/A36 link” in the Core Strategy. The Inspector, in his report, at the 1990 Public Inquiry into the Swainswick and Batheaston bypasses and the A46/A36link firmly rejected the latter as “..intolerable in its landscape impact..”. The Cotswold Area of Outstanding Beauty and Green Belt which contribute to Bath’s World Heritage Site Setting must continue to be protected . A link road will do nothing to solve Bath’s air quality and congestion problems as many so often mention. Most car drivers have business in the B&NES area and therefore few would benefit from an expensive link road.

Para 6.95 JLTP3 has dropped the idea of an A46/A36 link road as it would not help to achieve its goals. B&NES should do the same. Re JLTP why does Bath’s eastern neighbour (Wiltshire) not participate in this planning ?

There is no mention of policies to control, discourage or remove HGV’s which have no need to come into the area. What has happened to the proposed A36 or Cleveland Bridge restrictions mentioned in previous plans ?

**Change sought to make sound:** i) Remove all mention of an A46/A36 Link road from the Core Strategy. ( para 6.94)

ii) Include investigation of possible RAIL based solutions to Transport and Movement problems.

iii) Invite Wiltshire to participate in seeking Transport and Movement solutions particularly regarding HGVs.

iv) Ensure policies are included to control visiting coaches and their passengers.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 232\5 S

**Respondent:** Compton Martin Parish Council

**Representation** Public transport infrastructure to be in place before restrictions on developments in relation to the car.

**(soundness):**

**Change sought to make sound:** Public transport infrastructure to be in place before restrictions on developments in relation to the car.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\17

**Respondent:** The Bath Society

**Representation** Paras 244 – 246 Transportation

**(soundness):** 1.No mention of use of rail to relieve road congestion and other local transport problems into, across and out of the World Heritage Site.

2. Para 2.46 The Greater Bristol Metro Project is currently unfounded.

**Change sought to** Lobby for the upgrading of rail signalling via West of England Partnership PLUS Wiltshire, for the  
**make sound:** increased and more efficient use of existing rail Infrastructure by increasing links to local stations east and west of Bath and to Frome. The reopening of Corsham station is a priority.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\28

**Respondent:** The Bath Society

**Representation** Para 6.93 Railways are not mentioned in the list.  
**(soundness):**

**Change sought to** 2.Include investigation of possible RAIL based solutions to Transport and Movement problems.  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\29

**Respondent:** The Bath Society

**Representation** Para 6.94 The Inspector's report, at the 1990 Public Inquiry into the Swainswick and Batheaston  
**(soundness):** bypasses and the A46/A36 link rejected the latter as intolerable on its impact on the landscape. The Cotswold Area of Outstanding Beauty and Green Belt, which are part of the World Heritage Site, must continue to be protected. A link road would not solve Bath's air quality and congestion problems. Most car drivers have business in the B&NES area and would not benefit from the link road.

**Change sought to** 1.Remove all mention of an A46/A36 Link road from the Core Strategy. ( para 6.94)  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\30

**Respondent:** The Bath Society

**Representation** Para 6.95 JLP3 has dropped the idea of an A46/A36 link road. B&NES should do the same. There is  
**(soundness):** no mention of policies to control or remove HGV's in this area. Where are the restrictions proposed for the A36 or Cleveland Bridge.

**Change sought to** Remove all mention of the A46/A35 link road. Invite Wiltshire to participate in seeking Transport and  
**make sound:** Movement solutions particularly regarding HGVs.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 269\8

**Respondent:** Barratt Homes Bristol

**Representation** Well Connected  
**(soundness):** Paragraphs 6.93-6.95

Objections are submitted against the continuing safeguarding of the route for the Whitchurch bypass scheme.

During the preparation of the Bath & North East Somerset Local Plan the Inspector concluded that the need for the bypass had not been fully determined and recommended that the policy in relation to the bypass (Policy T.17) be deleted from the Plan. The Inspector stated:

"In my view the possibility of a future urban extension is not good enough reason to retain these safeguarded routes, and gives no indication that the routes are likely to be developed during the plan period. In the event that an urban extension is planned in the Whitchurch area, studies would be

required on the traffic implications and proposals for new routes/bypasses should be properly formulated, costed and funded at that time.”

In respect of the A37 bypass, final draft Joint Local Transport Plan 3 (which is due for adoption in March 2011) includes the Whitchurch bypass in a list of ‘Other Significant Transport Schemes’. However, paragraph 11.9.1 of the document states:

“It should be acknowledged that at the funding levels emerging from the Comprehensive Spending Review, opportunities to bring forward these schemes through the major schemes process in the period to 2026 appear significantly constrained.”

Furthermore, in response to the Inspector’s Report the Council published its Statement of Decisions stated as follows:

“Previous studies have indicated that neither of the two A37 bypasses at Whitchurch and Clutton/Temple Cloud are justified by existing traffic levels but this is likely to change as a result of the Regional Spatial Strategy proposal for south Bristol development including the proposal for an Urban Extension at south Bristol.”

The draft Core Strategy removes this requirement for an urban extension and therefore the need for a bypass at Whitchurch is questionable. It is therefore considered that there is no need to safeguard the alignment for the bypass which has no justification and is unlikely to ever obtain funding. PPS12 ‘Local Spatial Planning’ states that proposals should only be pursued where they have a realistic prospect of implementation within the plan period. This bypass has no prospect of being implemented in the plan period. Furthermore it has no transport or economic justification and should be deleted.

**Change sought to** Change Required

**make sound:** Remove reference to the continuing safeguarding of the Whitchurch bypass scheme.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 273\3

**Respondent:** Transition Bath

**Representation** Many times walking and cycling are mentioned and there is a section ‘to continue the longstanding

**(soundness):** theme of reducing car dependency and working towards making walking, cycling and the use of public transport, the more attractive option for travel’. However, elsewhere BANES seem to have put the emphasis on predicting and providing for car growth. Providing for the car is now acknowledged as a key factor in actually encouraging car use, and Bath has so far failed in ‘reducing car dependency’ or in providing substantial improvements for pedestrians, cyclists or public transport. This problem needs to be addressed.

**Change sought to**

**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 311\5

**Respondent:** Parish Council's Airport Association

**Representation** The PCAA also believe that the Draft Core Strategy must also consider and take into account the impact

**(soundness):** of the airport on the existing and any future transportation and road infrastructure plans. B&NES own conclusions when considering the Planning Application for the proposed Airport Expansion in 2009 / 2010 stated considerable concerns over the existing and future impact of East West and West East access to the airport through the various villages within the council area. The concern was so great that requests were put in to North Somerset Council to ensure sufficient 106 agreements were in place to help mitigate the airport's impact. However, we believe leaving the responsibility solely in the hands of another authority is dangerous and therefore that it is important that the scope of the Draft Core Strategy allows for full consideration and addresses the potential impact the airport currently has and will have on the Road and Transportation infrastructure within Bath & NES.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 822\9

**Respondent:** Somer Valley Friends of the Earth

**Representation** The destination management plan is concerned with tourism in Bath, the Infrastructure delivery  
**(soundness):** programme relies on the development of key sites to deliver transport network improvements in places like Radstock and Midsomer Norton (the proposed RAD1 development in the case of Radstock) . There is no evidence of any travel studies that could be used to inform an assessment of the environmental impact of the proposals associated with the additional travel demands, despite recognition of out-commuting and congestion as a probelm. Similarly, there are no noise or air quality studies to draw upon. The Environment evidence base appears to consist of only evidence in respect of flood risk, renewable energy, waste and landscape (appearance), with the the Nature Map for the South West and the now essentially inoperative WILDthings Biodiversity Action Plan thrown in. There is more to environment than this. It is difficult to see how the environmental constraints can be understood when the baseline data is not all there.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 6.94**

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**Reference:** 102\22 S

**Respondent:** Federation of Bath Residents' Associations

**Representation** Core Policies 6f (p129)(Well connected)

**(soundness):** FoBRA supports this policy, and particularly welcomes the following:

Para 6.94 (Transport and Movement): the Council recognises the need for a study to assess an A46/A36 link and it points out the problem of excessive traffic in Bath though this should also be carried through to a commitment to do something about it via a master plan

**Change sought to none  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 118\7 S

**Respondent:** Mrs J. Tinworth

**Representation** Increase in traffic - protect area from pollution from fumes. Also roads will not support more traffic

**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 143\11

**Respondent:** Bathampton Parish Council

**Representation** Paragraph 6.94 expresses the need for studies assessing development of an A36/A46 link yet no such  
**(soundness):** development is proposed in the LDF period to 2026 and reference to such a connection should be deleted.

**Change sought to make sound:** Delete reference to the A36/A46 link from the Core Strategy.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 153\5

**Respondent:** Claverton Parish Council

**Representation** The statement in Policy 6f, paragraph 6.95 that - "The Council .....recognises the need for studies to  
**(soundness):** assess .....an A46/A36 link" is alarming. This, superficially, innocuous statement has significant implications, in direct conflict with many other policies within the Core Strategy. It is not based on robust evidence and does not reflect long standing and valid environmental concerns expressed by both the local Bath and wider community and at a previous public inquiry into such a scheme. For many years an A36/A46 link road has been suggested as a possible above ground eastern by-pass to the City of Bath. However, it is universally accepted that such a scheme would have a devastating impact on the Cotswolds AONB, City of Bath World Heritage Site landscape setting and amenity of the area east of Bath. This highly controversial scheme is unsustainable. It is not the answer to traffic congestion and air pollution problems in the City of Bath.

Further key considerations:

- (a). The Core Strategy Spatial Options Document - Consultation Report omits, e.g. on pages 61-63, any reference to the detailed concerns expressed in Claverton Parish Council's representation about an A36/A46 link road. Similar concerns are known to have been expressed in representations by other organisations and Parish Councils.
- (b). For the convenience of the Inspector, the following comments summarise the Claverton Parish Council representation and further underpin why the Parish Council considers inclusion of the link road in the Core Strategy to be unsound.

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- (i). It has been firmly established that bypasses attract extra traffic. Rather than building an extremely expensive link road, thereby encouraging traffic to the Bath area, lower cost measures should be employed to discourage through-city traffic in the first place. The number of through-HGVs which would be removed by a link road is too small to justify the undisputed and permanent damage to the Avon & Limpley Stoke Valley and City of Bath World Heritage Site landscape setting. The damaging impact of HGVs on the city can be tackled by measures which would remove more HGVs (through N-S, E-W & local) than a link road. These measures, which are outlined in the B&NES draft Air Quality Action Plan, include the relatively low cost HGV ban on Cleveland Bridge or the A36 Warminster Road, as originally proposed by the Council in 2005. Such a ban is the only acceptable option to protect both the City of Bath WHS and its landscape setting. The Parish Council understands that B&NES Cabinet strongly supports such a scheme. It is also relevant to note that future use of the recently approved Deep Sea Marine Terminal at Avonmouth should significantly reduce the volume of HGV traffic between south coast ports, via the Bath A36/A46 corridor, and the M4/M5 interchange area.
- (ii). The wider harm and disbenefits which a link road would bring, outweigh any presumed benefits. A link road would not solve Bath's traffic congestion problems because traffic is predominantly local, as highlighted by B&NES: "In the Bath urban area, Government figures suggest that fewer than 1 in 20 cars represent through traffic during the morning rush hour, so a bypass would not tackle the thousands of cars whose destination is Bath"
- (iii). The many statements made in the Bath WHS Management Plan, West of England Joint Local Transport Plan (JLTP3) and other key policies in the Core Strategy make it clear that protection of both the WHS and its landscape setting constitutes, in planning parlance, "a very special circumstance". This has been brought into sharp focus by the 2009 Government Circular on protection of WHSs, the 2009 B&NES "Bath WHS Setting Study" and the 2008 City of Bath UNESCO report. In particular, the UNESCO



report highlights the need to reinforce protection of both the surrounding landscape and the views to and from the City of Bath. The considerations outlined in these reports reinforce previously expressed concerns about the dramatic impact which an A36/A46 link road would have on the Cotswolds AONB and WHS landscape setting, in particular those expressed at the 1990 public inquiry which rejected comprehensively a proposal for an A36/A46 link road as being "...intolerable in its landscape impact and devastating to recreational amenity" - unambiguous words which remain wholly relevant.

(iv). Against a background of the vision, objectives, strategies and policy statements in the draft Core Strategy, and these recent international, national and local reports on the WHS and its landscape setting, it is very clear that no case can be made to justify the continued presence of an A36/A46 link road in B&NES/West of England transport planning.

(v). An A36/A46 link road and the, now planned, 1400 space Park and Ride on Bathampton Meadows would combine to have a catastrophic impact on the landscape and amenity of the whole area east of Bath. Set against the vision, objectives, strategies and policy statements in the draft Core Strategy, this must never be allowed to happen

(vi). The absence of the A36/A46 link road from the West of England JLTP3 transport Vision to 2026 is welcomed. Looking towards 2026 and beyond, B&NES must relinquish, once and for all, any aspirations for an A36/A46 link road through the WHS landscape setting and Cotswolds AONB. To do otherwise would be to undermine the credibility of the Core Strategy and signal B&NES intention to abandon the WHS landscape setting rather than protect it.

**Change sought to** The reference to the A36/A46 link road on page 129, paragraph 6.94 of Policy 6f should be removed  
**make sound:** and no other references to a link road should be inserted.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 162\10

**Respondent:** Batheaston Parish Council

**Representation** a). An A36/46 link road

**(soundness):** Paragraph 6.94 expresses the need for studies assessing development of an A36/46 link yet no such development is proposed in the LDF period to 2026 and reference to any such connection should be deleted from the CS text. Indeed, the maintenance as open countryside in the Green Belt of the River Avon valley bottom land immediately east of the WHS should be declared in the CS as an immutable principle and clearly expressed in geographical terms on Diagram 5 as part of a buffer zone surrounding the World Heritage City (page 33).

**Change sought to** (i) Delete "and an A46/36 link" from 6.94

**make sound:**

**Representation (legal compliance):** The claimed public support for the scheme does not truly reflect the results of such public participation as was carried out in the devising of it. From the abandonment of the proposal to establish a park-and-ride site at Lambridge, on land currently the training ground of Bath Rugby, the preparation of the Bathampton meadows scheme was pursued in secrecy until the publication of the completed planning application, when 2 presentation meetings, claimed as 'consultation' by the LPA, were held. We maintain this was wholly contrary to the LPA's adopted Statement of Community Involvement as the community was not consulted during the formulation of the proposal..

**Change sought to make legally compliant:**

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**Reference:** 173\1

**Respondent:** David Beasley

**Representation** Para 6.94 reads:

**(soundness):** "The B&NES highway network remains heavily trafficked highlighting the need to undertake transport and access improvements and major capital infrastructure projects to facilitate growth in housing numbers and jobs, to minimise the adverse effect of traffic, and to enable environmental improvement to be made to existing centres. The Council will continue to safeguard routes for the Whitchurch bypass and Temple Cloud/Clutton bypass and recognises the need for studies to assess the Saltford bypass and an A46/A36 link."

Not Justified:

Para 6.94 asserts that there is a "need" for the highway network to have "transport and access improvements and major capital infrastructure projects". There is nothing in the Draft Core Strategy which demonstrates a "need" for building increased road capacity, nor is there anything which shows that this would contribute to the sustainability objectives.

This approach is not the most appropriate strategy for reducing road congestion and the harmful effects of high traffic volumes (see below). It is inconsistent with other parts of the Draft Core Strategy which make clear the need to reduce car use and encourage travel by other means (e.g. paras 1.12, 6.100, Objectives 1 and 7, and elsewhere). These alternative strategies are more appropriate and more sustainable.

Not Effective:

The strategy of building more roads as a means to reduce congestion was discredited by the Government's 1994 SACTRA report, which showed that adding road capacity stimulates growth in transport - which then leads to more congestion. The most effective way "to minimise the adverse effect of traffic" is to reduce the amount of traffic. This approach is consistent with other parts of the Draft Core Strategy and local and national policy.

Not Consistent with national policy

The Department of Transport acknowledge that increased road space leads to more traffic and emissions (<http://www.publications.parliament.uk/pa/cm200506/cmselect/cmenvaud/981/981-i.pdf>, para 89, p54) Therefore, increasing road capacity is inconsistent with national targets on reducing carbon emissions.

**Change sought to make sound:** To make para 6.94 consistent with other parts of the Draft Core Strategy and with national targets and regional policies, it should be reworded as follows: (changed words are in capitals)

"The B&NES highway network remains heavily trafficked IN SOME PARTS, highlighting the need to REDUCE THE AMOUNT OF TRAFFIC. To facilitate growth in housing numbers and jobs, to minimise the adverse effect of traffic, and to enable environmental improvement to be made to existing centres, DEVELOPMENT WILL BE LOCATED WHERE THERE IS MINIMAL NEED TO TRAVEL BY CAR, AND SUPPORTED BY HIGH QUALITY TRANSPORT INFRASTRUCTURE WHICH HELPS TO INCREASE THE ATTRACTIVENESS OF PUBLIC TRANSPORT, WALKING AND CYCLING. AS THE POLICIES IN THIS STRATEGY TAKE EFFECT, AND CAR USE REDUCES, CONGESTION IS EXPECTED DIMINISH, AND WITH THAT, THE IMPETUS FOR NEW ROAD CONSTRUCTION."

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 174\1

**Respondent:** Mrs Barbara Gordon

**Representation** Para 6.94 reads:

**(soundness):** "The B&NES highway network remains heavily trafficked highlighting the need to undertake transport and access improvements and major capital infrastructure projects to facilitate growth in housing numbers and jobs, to minimise the adverse effect of traffic, and to enable environmental improvement to be made to existing centres. The Council will continue to safeguard routes for the Whitchurch bypass and Temple Cloud/Clutton bypass and recognises the need for studies to assess the Saltfort bypass and an A46/A36 link".

Not Justified:

Whilst there is a need as para 6.94 asserts for a highway network to have "transport and access improvements and major capital infrastructure projects" there is nothing in the Draft Core Strategy which demonstrates a "need" for building increased road capacity, nor is there anything which shows that this would contribute to the sustainability objectives. This approach is not the most appropriate strategy for reducing road congestion and the harmful effects of high traffic volumes. It is inconsistent

with other parts of the Draft Core Strategy which make clear the need to reduce car use and encourage travel by other means (e.g. paras 1,12,6.100, Objectives 1 and 7, and elsewhere). These alternative strategies are more appropriate and more sustainable.

Not Effective:

The strategy of building more roads as a means of reducing congestion was discredited by the Government's 1994 SACTRA report, which showed that adding road capacity stimulates growth in transport – which then leads to more congestion. The most effective way “to minimise the adverse effect of traffic” is to reduce the amount of traffic. This approach is consistent with other parts of the Draft Core Strategy and local and national policy.

Not Consistent with National Policy:

The Department of Transport acknowledges that increased road space leads to more traffic and emissions (<http://www.publications.parliament.uk/pa/cm200506/cmselect/cmenvaud/981/981-i.pdf>, para 89, p54). Therefore increasing road capacity is inconsistent with national targets on reducing carbon emissions.

**Change sought to** To make para 6.94 consistent with other parts of the Draft Core Strategy and with national targets and **make sound:** regional policies, it should be reworded as follows: (new wording in italics.)

“The B&NES highway network remains heavily trafficked in some parts, highlighting the need to reduce the amount of traffic. To facilitate growth in housing numbers and jobs, to minimise the adverse effect of traffic and to enable environmental improvement to be made to existing centres, development will be located where there is minimal need to travel by car and supported by high quality transport infrastructure designed to help increase the attractiveness of public transport, walking and cycling. As the policies in this strategy take effect and car use reduces, congestion is expected to diminish, and with that the impetus for new road construction.”

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\9

**Respondent:** Bath Preservation Trust

**Representation** The CS does not demonstrate that the Council has a comprehensive and coherent strategy for **(soundness):** achieving its aspirations in relation to transport. There is no evidence of coherence with neighbouring authorities outside the West of England Partnership (i.e. Wiltshire) despite the importance of connectivity with the towns and villages in West Wiltshire and the scope for reducing through traffic in Bath by making better use of the A350 for north-south through traffic and the A420 for east-west through traffic. There is only one reference to transport infrastructure in Table 2 (item DW1.13 – Greater Bristol Bus Network), and table 5 refers only to the Bath Transport Package, which as the Council has always recognised is not a comprehensive strategy for resolving Bath's transport problems, and to the longer-term possibility of improvements to the rail services. We would have expected to see consideration of a direct public transport link between Bath and Bristol Airport, for example. There is little recognition in Section 6 of the importance of public transport in reducing dependence on the private car and thereby helping to achieve the Council's climate change objectives.

As noted in our covering comments, we believe that sub-regional solutions may be achievable for reducing North/South through traffic and facilitating access into Bath from Junction 18 of the M4. These options should be properly explored before the proposed Park and Ride at Bathampton is built, and before any further study of an A46/A36 link cutting through the setting of the WHS.

We were surprised by the reference in 6.94 to a study of a Saltford bypass. We have not seen any evidence to support such a proposal, which would inevitably have a very damaging impact on the Bath/Bristol Green Belt. Improvements to the public transport options and encouragement for the use of the A420 for through traffic would surely be better solutions.

**Change sought to** Amend 6.94 to remove references to studies to assess the Saltford bypass and an A46/A36 link, and  
**make sound:** include an undertaking to work with Wiltshire as well as the West of England Partnership to identify the optimum ways of reducing unnecessary vehicle movements into and through the city of Bath. In particular consideration should be give to ways of encouraging through traffic to use existing alternative routes.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 256\10

**Respondent:** Councillor Andrew Furse

**Representation** •6f; There is no rationale as to why a bypass is required - removal of a study for a Saltford bypass .  
**(soundness):**

Councillor Andrew Furse  
Liberal Democrat,

**Change sought to**  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\26

**Respondent:** The Bath Society

**Representation** Construction of an A36/A46 link road would devastate the landscape to the east of Bath , part of the  
**(soundness):** setting of the World Heritage Site. The Inspector who conducted the Batheaston By Pass Public Enquiry rejected the link proposal out of hand. He said the adverse impact on the landscape would be totally

**Change sought to** Omission of the A36/A46 link road from the Strategy. Inclusion of a ban on HGV using the Cleveland  
**make sound:** Bridge.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 273\6

**Respondent:** Transition Bath

**Representation** We are very pleased to see that reducing carbon emissions, and ‘to minimise the adverse effect of  
**(soundness):** traffic,’ has a central role in the Core Strategy and ‘Enhancement of local centres and other facilities within close walking or cycling distance from where people live’ ,is acknowledged as making ansignificant contribution.

**Change sought to**  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 298\14

**Respondent:** Liberal Democrat Group

**Representation** Paragraph 6.94

**(soundness):** Inconsistent with other policies on sustainable transport.

**Change sought to** “The B&NES highway network remains heavily trafficked highlighting the need to undertake transport  
**make sound:** and access improvements and major capital infrastructure projects to facilitate growth in housing numbers and jobs, to minimise the adverse effect of traffic, and to enable environmental improvement to be made to existing centres.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 384\4

**Respondent:** Wiltshire Council

**Representation** Overall, there is the need to reflect on the fact that transport movements and systems do not stop at  
**(soundness):** administrative boundaries and that there is a dynamic transport/housing relationship regarding unmet housing need and/or an unaffordable housing market, and increased commuter movements from western Wiltshire. The B&NES Core Strategy document does not fully discuss or address this issue.

There is no detail within the Core Strategy in respect of demand management policies and little recognition that such policies should consider the adjacent areas and the potential to increase car usage outside of demand management areas, as motorists seek to avoid such schemes. Reference is made to implementing a new Parking Strategy for Bath and providing a new Park and Ride site to the east of the city, this could have implications for travel from Wiltshire into Bath. Through the implementation of appropriate parking controls and charges, the former could encourage people to travel into Bath by more sustainable means. However, the latter could partly lessen this effect especially if Park and Ride charges are not well related to bus and rail fares - typically, Park and Ride charges higher than bus/rail fares but lower than parking charges.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 384\6

**Respondent:** Wiltshire Council

**Representation** Core Policy 6f (6.94) - Wiltshire Council should be involved in any study to assess the potential of a  
**(soundness):** A36/A46 link as this is likely to have implications for areas within Wiltshire such as Limpley Stoke.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 740\4 S

**Respondent:** Paul Ollis

**Representation**  
**(soundness):**

**Change sought to make sound:** I believe the completion of the ring road should have a higher priority.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Plan Reference: Paragraph 6.95**

**Reference:** 143\8

**Respondent:** Bathampton Parish Council

**Representation** This policy refers to the JLTP3 which incorporates the BTP. One element of the BTP is the Bathampton  
**(soundness):** Meadows Park and Ride site proposal. Bathampton Parish Council continues to oppose this proposal for the following reasons:

1. B&NES's own consultants admit the development would have no significant effect on traffic congestion or traffic-generated air pollution;
2. It would offer no contribution to relief from the damaging effects of heavy goods vehicle traffic

passing through Bath;

3. Traffic currently diverting to other routes as a result of delays in London Road, Bath would return;
4. The existing bus lane in London Road is served by bus services with 9 journeys in off-peak hours with 2 stopping places in the reserved lane;
5. It would encroach on the Green Belt and be widely visible from viewpoints in the neighbouring Cotswold AONB in a location which should form part of a geographically-defined open green buffer zone around the City of Bath World Heritage site. The WHS and the valley together form an important component of an outstanding local landscape;
6. The planned provision of 1400 spaces falls short of the B&NES Council's estimate of the 1800 spaces needed, yet the physical constraints at the site would prevent any future expansion, and it is therefore not sustainable
7. The scheme is an integral part of the Bath Transport package, the business case for which is based on unsupportable assumptions.
8. The claimed public support for the scheme does not truly reflect the results of such public consultation as was carried out.

If the Bathampton Meadows Park-and-Ride site is rejected the problem of provision of an alternative location east of Bath may only be possible in the area of another LPA. However, the latest estimates produced by the LPA show a greater proportion of traffic entering Bath from the north (A46) than from the east (A4). This alone clearly indicates the need for a review of possible sites, including the deletion of the Bathampton Meadows site.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 6.97**

**Reference:** 273\4

**Respondent:** Transition Bath

**Representation** We very much regret that the document does not appear to demonstrate how the principles to govern **(soundness):** the provision of sustainable transport network for the whole City will be applied over the plans period.

We appreciate the statement 'better and more sociable places are created where people dominate, rather than vehicular traffic. Streets are not just for movement; they form the shared public space between buildings, where city, town or village life takes place'.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 6.98**

**Reference:** 298\15

**Respondent:** Liberal Democrat Group

**Representation** Paragraph 6.98

**(soundness):** To underpin the sustainable transport strategic objective relating to the Bath Travel To Work Area.

**Change sought to make sound:** "Measures that support the shift to more sustainable modes of transport and that improve levels of accessibility to and within Bath, Keynsham, Somer Valley and the Rural Areas will be supported and promoted, as will improvements in sustainable movement connections to the towns of North and West

Wiltshire and Mendip”.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 384\7

**Respondent:** Wiltshire Council

**Representation** In the past there has been dialogue between the authorities on the possibility of reopening Corsham  
**(soundness):** train station, this was also referred to during the Core Strategy Full Council Report. However there is no indication of such schemes, nor is there reference to joint strategies with neighbouring authorities to encourage more sustainable travel methods. Further clarification on the status of such schemes should be made available.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 6.101**

**Reference:** 384\5

**Respondent:** Wiltshire Council

**Representation** Core Policy 6f (6.101) - Reference is also made to the implementation of the Air Quality Management  
**(soundness):** Plan for Bath. It would be useful if a summary of actions could be given as some (e.g. a weight limit on Cleveland Bridge) could have implications for traffic movements in Wiltshire.  
Through previous dialogue between Wiltshire Council and B&NES the possibility of future strategies to limit HGV traffic within Bath have been discussed. Whilst the merits of this are obvious for Bath the impact on the wider road network needs to be considered in terms of increased congestion and the unsuitability of some roads to accommodate traffic.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 6.102**

**Reference:** 262\5

**Respondent:** Woodland Trust

**Representation** We would like to see this section of the Core Strategy reflect government policy on using trees and  
**(soundness):** woodland to improve air quality and peoples' health, amongst the many other benefits that they can also provide. We draw the Strategy's attention to two key documents :-

1.The Case for Trees: Forestry Commission (2010)

Sets out 'The multiple value of trees for people and places – increasing greenspace and tree numbers is likely to remain one of the most effective tools for making urban areas more convivial', and lists those benefits (on p.10) as –

- Climate change contributions
- Environment advantages
- Economic dividends
- Social benefits.

The presence of trees encourages people to exercise, thereby reducing the incidence of heart attacks

and type 2 diabetes. Trees absorb considerable quantities of airborne pollutants and the resulting cleaner air cuts asthma levels.

Wooded environments are known to calm people, relieve stress and provide a spiritual value that supports improved mental health and well being.

The general health dividend provided by trees has been scientifically proven. Dutch research shows neighbourhoods with good tree cover are significantly healthier than less green urban areas. Because trees provide increased shade, the risk of skin cancer in tree covered areas should be lower.

Trees near to buildings can improve home energy efficiency. As trees baffle sound, traffic noise levels are cut. Crime is reduced where streets are greened. Visually unappealing aspects or features can be hidden from view by trees.

Family and community environments are much more harmonious and closely knit where the urban setting includes trees. A sense of place and a feeling of pride in surroundings are also heightened.

The superior educational value of green classrooms is now widely accepted. There is also evidence to suggest that students perform better in premises where plants are present.

2.Forest Research Report on Benefits of Green Infrastructure (October 2010):

Trees and woods are vital to the health of people in the UK. There is a strong correlation between the quality of the natural environment where people live and their wellbeing. Increasing tree and woodland cover can be seen to reduce the impacts of poor air quality, mitigate some of the effects of a warming climate, particularly in urban areas, and increase opportunities for people to adopt a healthy lifestyle - see the Forestry Commission's publication Benefits of green infrastructure (Report by Forest Research, October 2010).

More native trees and woods could save millions of pounds in healthcare costs in a time of constrained public expenditure. Around £110bn is spent each year in the UK on healthcare, equal to 8.5% of all income. It has been estimated (Natural England, Our Natural Health Service, 2009) that if every household in England had good access to quality green space, it could save around £2.1bn annually in health care costs and woodland can be a major contributor to this saving.

Trees further improve air quality through the adsorption of particulates from vehicle emissions and other sources – such that it has been estimated that doubling the tree cover in the West Midlands alone would reduce mortality as a result of poor air quality from particulates by 140 people per year. (Stewart, H., Owen S., Donovan R., MacKenzie R., and Hewitt N. (2002). Trees and Sustainable Urban Air Quality. Centre for Ecology and Hydrology, Lancaster University).

**Change sought to** We would like to see Paragraphs 6.100 – 6.102 reflect government policy on using trees and woodland  
**make sound:** to improve air quality and peoples' health, and for this to be backed up in a Trees & Woodlands Supplementary Planning Document (SPD).

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 6.103**

**Reference:** 224\10

**Respondent:** Bath Preservation Trust

**Representation** On a positive note, we commend paragraph 6.97 which is a very clear articulation of the importance of  
**(soundness):** reducing vehicular traffic in our streets and public spaces. We welcome paragraph 6.103, but consider that it should include an explicit commitment to implementing the Council's Public Realm and Movement Strategy for Bath City Centre.

**Change sought to** Strengthen 6.103 by making explicit reference to the Council's commitment to implementing the PRMS  
**make sound:** for Bath City Centre.



**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 279\12

**Respondent:** English Heritage

**Representation** Transport

**(soundness):** Many past transport interventions have had a detrimental impact, whether this is through changes to the road system, or additional street clutter.

When considering any transport strategy including changes in road network capacity and the net benefits to the environment, it is essential that the impacts of these changes upon the historic environment are carefully considered.

Greater emphasis therefore must be placed upon the need for transport infrastructure to be of high quality design that respects local context and character, including the historic environment. The Core Strategy provides an opportunity to make this case at a strategic level.

What design principles will apply to highway/traffic/transport schemes within sensitive historic locations? How can you ensure the works associated with showcase bus routes are appropriate to a world heritage site? How will excessive signage and lighting be avoided for example? How can sensitive practice be assured?

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Policy CP13: Infrastructure Provision**

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**Reference:** 42\3

**Respondent:** Bitton Parish Council

**Representation** the continued provision of effective cross-boundary public transport links to enable people from a wider area to access facilities in the Keynsham area.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 93\6 S

**Respondent:** Highways Agency

**Representation** Whilst we do not consider this makes the Strategy unsound, the Agency is concerned that there is no **(soundness):** reference to the Strategic Road Network within the Infrastructure Delivery Programme (although the Agency acknowledges that this is an evolving document). The IDP document is cross referenced several times within the Core Strategy, where it is identified to be the mechanism for securing infrastructure in line with development.

The Agency's concerns specifically related to a lack of reference within the IDP about potential improvements required to the SRN as a result of development, and, that the explanatory text within the Core Strategy potentially limits infrastructure contributions to those identified within the IDP. This raises concerns for the Agency, as our position to require developers to fully fund mitigation works to the SRN, resulting from the impact of proposed development is potentially weakened.

Whilst the Agency is not suggesting that there are infrastructure improvement schemes required on the

SRN at this stage, the lack of reference to the SRN may result in this tier of infrastructure being overlooked by developers during the preparation stage of schemes. This lack of clarity is of significant concern to the Agency, as the wording could potentially restrict the Agency's ability to secure funding for SRN infrastructure improvements required to mitigate development.

In addition, the Council identifies that the evidence base for infrastructure requirements is a key aspect of the Core Strategy (and that the IPO provides the mechanism to secure funding). On this basis, major applications must include a robust evidence base supported by an up-to-date Transport Assessment that is produced in line with the guidance set out within the Oft's Guidance on Transport Assessment document (2007). If mitigation works are required as a result of the development, then the developer will be required to fund works. The Council should also identify their interpretation of major development within the Core Strategy.

**Change sought to make sound:** The Council should insert text within the IPO and Core Strategy to identify the requirement for major applications to include a robust and up-to-date Transport Assessment, in order to ensure that the required infrastructure is provided in step with development growth.

The Agency wish to see the Council insert text within the IPO and CP13 of the Core Strategy to identify that a flexible approach to securing contributions for infrastructure in addition to what is identified within the IOP will be sought, in line with the guidance of Circular 05/2005 and Regulation 122 of the Community Infrastructure Levy (CIL) Regulations April 2010

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 102\4

**Respondent:** Federation of Bath Residents' Associations

**Representation (soundness):** There is a glaring omission here, and indeed in the Core Strategy generally, that transport matters are delegated sideways to the JLTP3.

**Change sought to make sound:** Major developments should only be permitted in conjunction with suitable public transport infrastructure.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 147\10

**Respondent:** Bath Green Party

**Representation (soundness):** DW16 : Does the proposed core policy for infrastructure provision include all the necessary elements? No, it also needs to include:

- Community space, meeting places/rooms, youth centres and play areas - and community involvement in developing these.
- Allotments and food growing space to meet demand
- Clear and dominant walking and cycling routes

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 184\8

**Respondent:** Persimmon Special Projects

**Representation (soundness):** See above response to 6a.

**Change sought to make sound:**

**Representation (legal compliance):** Persimmon Special Projects considers the Policy is not sound and may not be legally compliant, on the basis that Policy CP13 relies on a Non-Statutory Planning Obligations SPD to assess infrastructure contributions. That is no longer acceptable because the S106 contributions now have to conform with Regulation 122 of the CIL Regulations which came into force on the 6th April 2010.

Developer contributions can only be sought where it can be demonstrated that the need for the contribution arises directly as a result of the development. The requirement in Regulation 122 is actually a repeat of one of the tests of validity set out in Circular 05/2005. The test has not changed, but what has is that the Circular advice is just that, advice without the force of Law, whereas the CIL Regulations have statutory force. This places greater onus on Local Planning Authorities to demonstrate the contributions which they seek are directly related to the development. A Developer will have the ability to challenge the contribution on that basis, even if it is included within an Adopted SPD. That will mean Appeals on a case by case basis and an inefficient use of Inspectors and Inquiry time when that position can be avoided.

Equally, Developers will have the ability, on a case by case basis by Appeal, to challenge the Methodology which is led to the calculation of the contribution per dwelling for each element of the contribution sought. This is again likely to lead to inefficient use of Inquiry time and will mean contributions being determined by different Inspectors on a case by case basis with no consistency.

The introduction of CIL sought to overcome these difficulties and will be subject to a single Independent Examination by an Inspector, which is then less likely to be challenged.

In our view, the Council should use the SPD as an evidence base to work towards a full CIL Charging Schedule in parallel with the Core Strategy to avoid the problems set out above.

**Change sought to make legally compliant:** The Council should prepare a full CIL Charging Schedule.

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**Reference:** 203\1

**Respondent:** Ernst Sands

**Representation (soundness):** The transport proposals will not be anything like radical enough to mitigate the economic effects, air pollution and noise. They cannot meet present situation let alone all the Bath developments proposed in the next 20 years. Current economic cost of congestion is £50 million per annum ie. 100% less of Bath's current economic output.

**Change sought to make sound:** There are currently around 17,000 vehicles/ 24 hour period entering Bath from East and West. The total proposed capacity of Park and Ride schemes is only 4,510. This will not significantly reduce congestion/pollution levels. Drastic action will be required on the lines of the London Majors transport Strategy e.g. Congestion charging and low emission zones.

**Representation (legal compliance):** BANES do not currently meet National or European Air Quality standards. E.g. Nitrogen Dioxide levels in worst case is 208% higher than specified limit. Core Strategy as presently written will not correct this problem and make BANES compliant.

**Change sought to make legally compliant:** Take steps to ensure BANES is fully compliant with National and European Air Quality standards now and also the next 20 year period.

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**Reference:** 224\60

**Respondent:** Bath Preservation Trust

**Representation (soundness):**

**Change sought to make sound:**

**Representation (legal compliance):** As the manager of the World Heritage Site (responsible to HMG as the State Party) B&NES has a legal responsibility to ensure proper protection of the WHS. Infrastructure provision (roads, car parks, renewable energy installations etc) has the potential to cause serious damage to the integrity and authenticity of the WHS, and Policy CP 13 should make clear that such damage will not be accepted.

**Change sought to make legally compliant:** The last sentence of the policy should include a reference to the WHS and its setting as well as to European wildlife sites.

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**Reference:** 224\61

**Respondent:** Bath Preservation Trust

**Representation (soundness):** Infrastructure delivery partners need to be alerted to the fact that in the particular circumstances of Bath, protection of the World Heritage Site and its setting is of paramount importance. Unless policy

CP13 highlights the importance of WHS considerations, there is a risk that time and money will be wasted in developing unsuitable proposals.

**Change sought to make sound:** The last sentence of the policy should include a reference to the WHS and its setting as well as to European wildlife sites.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 227\6

**Respondent:** London Road Area Residents Association

**Representation (soundness):** The wording of CP13 is weak. It omits B&NES direct responsibility for Transport and Movement matters. Instead responsibility is shuffled to the 'JLTP3'.

We again point out that Wiltshire (Bath's eastern neighbour) is not included or consulted in this joint plan for the area. Many of Wiltshire's residents, living so close to Bath, are the commuters and shoppers driving in along the London Road.

Moreover there is no insistence that appropriate transport infrastructure be a pre-requisite of major developments.

**Change sought to make sound:** Policies are needed to encourage improvements to public transport provision from Wiltshire, both by bus and rail. This must be a priority.  
(As with our criticism of Flood Risk CP5) we suggest CP13 should state – No developments will be approved in the absence of previously agreed transport infrastructure provision.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 245\10 S

**Respondent:** Environment Agency

**Representation (soundness):** We support the intention to prepare a Planning Obligations Supplementary Planning Document in due course. In relation to flood risk in Bath, the Flood Risk Management Strategy and Infrastructure Delivery Plan provide sufficient detail to inform the Core Strategy on the likely flood risk management solutions and their timing/funding. However more detail will need to be provided in the placemaking/planning obligation SPD's on how specific flood risk management schemes required along the river corridor will be delivered and the mechanism by which funds will be collected. A clear planning framework in relation to flood risk infrastructure in the District will be required to ensure solutions are not implemented on an ad hoc site by site basis which could compromise delivery of the other objectives of the Core Strategy (e.g. amenity, ecology).

**Change sought to make sound:** N/A

**Representation (legal compliance):**

**Change sought to make legally compliant:** N/A

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**Reference:** 252\9

**Respondent:** Cadbury Kraft Foods

**Representation (soundness):** 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 1 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.

**Change sought to make sound:** 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.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 259\6

**Respondent:** Edmund Bruegger

**Representation** Policy CP13 – Infrastructure Provision – Page 132

**(soundness):**

Whilst no objection is made to the principle of this policy, there is no reference to the guidance contained within Circular 05/05 ‘Planning Obligations’ and the need for such contributions to be necessary, fair and reasonable, and directly related to the development. Past experience with the Local Planning Authority has demonstrated that contributions sought do not always comply with all the tests in Circular 05/05. Initial requests for contributions by the Local Planning Authority have subsequently been dropped when challenged on the basis of them not being justified.

**Change sought to make sound:** Change Required

**make sound:** i) Reference needs to be made within Policy CP13 or the supporting text to Circular 05/05 ‘Planning Obligations’ and to the fact that contributions would only be requested when clearly justified.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 262\2

**Respondent:** Woodland Trust

**Representation** We would like to see CP13 include a reference to green infrastructure, as a key component of

**(soundness):** delivering healthy neighbourhoods.

- Planning Policy Statement (PPS) 12 requires that Core Strategies are supported by evidence of green infrastructure (Communities & Local Government, 2008, para 4.8).
- Natural England’s ‘Green Infrastructure Guidance’ (NE 176, Natural England, 2009) states that: ‘The provision of green infrastructure in and around urban areas is now widely recognised as contributing towards creating places where people want to live and work. The concept of green infrastructure is embodied in the Government’s Planning Policy Statements (PPS) 1 and 12. It is an essential component of good planning for urban and rural areas, particularly in the face of climate change’.
- Green infrastructure can bring a wide raft of benefits to local neighbourhoods, particularly by using new native woodland as a delivery tool. An important publication from the Forestry Commission, The Case for Trees in development and the urban environment (Forestry Commission, July 2010), sets out ‘The multiple value of trees for people and places – increasing greenspace and tree numbers is likely to remain one of the most effective tools for making urban areas more convivial’, and lists (on p.10) the benefits as:
  - Climate change contributions
  - Environment advantages
  - Economic dividends
  - Social benefits.

**Change sought to make sound:** We would like to see Policy CP13 include a reference to green infrastructure.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 263\1

**Respondent:** Wessex Water

**Representation (soundness):** Dear Mr Trigwell,

Re: Draft Core Strategy- Publication Version

I refer to your letter of 13th December inviting comments on matters of soundness and legal compliance in connection with the Draft Core Strategy.

Wessex Water has previously provided high level comment on proposed development sites within the BANES area. We note that following the abolition of the RSS proposed development numbers have decreased, we will continue to liaise with the Planning Policy Team and developers in accordance with Policy DW1 point 7 "ensuring infrastructure is aligned with new development".

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 263\2

**Respondent:** Wessex Water

**Representation (soundness):** Dear Mr Trigwell,

Re: Draft Core Strategy- Publication Version

I refer to your letter of 13th December inviting comments on matters of soundness and legal compliance in connection with the Draft Core Strategy.

Wessex Water is the water sewage Undertaker for the majority of the Bath and North Somerset Region, supplying sewerage and potable water services to customers within the area (with Bristol Water supplying potable water to customers to the West of Bath, including the Somer Valley and Keynsham).

Wessex Water has previously provided high level comment on proposed development sites within the BANES area. We note that following the abolition of the RSS proposed development numbers have decreased, we will continue to liaise with the Planning Policy Team and developers in accordance with Policy DW1 point 7 "ensuring infrastructure is aligned with new development".

We note and support the policies which are pertinent to our responsibilities: Policies CP2 sustainable construction; CP5 Flood Risk Management; and CP13 Infrastructure Provision.

We also welcome continuing involvement in preparation of the Infrastructure Delivery Programme as outlined in Core Policy 6g, 6.105 in the light of the change in development numbers; locations and new legislation within the Water Industry.

Whilst we understand that comments are invited on matters of soundness and legal compliance, we can advise the following as a basis to proceed on Water and Sewerage Infrastructure Planning: Engineering appraisal will be required for major sites to confirm the scope and extent of improvements to the existing infrastructure. On going consultation with Wessex Water should be maintained to ensure infrastructure capacity improvements are planned to match rate of development.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 269\9

**Respondent:** Barratt Homes Bristol

**Representation** Policy CP13 – Infrastructure Provision

**(soundness):**

Whilst no objection is made to the principle of this policy, there is no reference to the guidance contained within Circular 05/05 'Planning Obligations' and the need for such contributions to be necessary, fair and reasonable, and directly related to the development.

**Change sought to make sound:** Change Required

Reference needs to be made within Policy CP13 or the supporting text to Circular 05/05 'Planning Obligations' and to the fact that contributions would only be requested when clearly justified.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 270\8

**Respondent:** Blue Cedar Homes

**Representation** Policy CP13 – Infrastructure Provision

**(soundness):**

Whilst no objection is made to the principle of this policy, there is no reference to the guidance contained within Circular 05/05 'Planning Obligations' and the need for such contributions to be necessary, fair and reasonable, and directly related to the development.

**Change sought to make sound:** Change Required

Reference needs to be made within Policy CP13 or the supporting text to Circular 05/05 'Planning Obligations' and to the fact that contributions would only be requested when clearly justified.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 272\1

**Respondent:** National Grid

**Representation** National Grid has recently appointed Entec to review and respond to development plan consultations

**(soundness):** on its behalf. We are instructed by our client to submit the following representation with regards to the current consultation on the above document.

Overview – National Grid

National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.

Electricity Transmission

National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity.

National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately

22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses.

To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.

#### Gas Transmission

National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances. New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.

#### Gas Distribution

National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London – almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.

#### National Grid and Local Development Plan Documents

The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:

- An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations).
- New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.

We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:

- Any policies relating to overhead transmission lines, underground cables or gas pipeline installations
- Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables



or gas transmission pipelines

- Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations
- Any policies relating to the diverting or undergrounding of overhead transmission lines
- Other policies relating to infrastructure or utility provision
- Policies relating to development in the countryside
- Landscape policies
- Waste and mineral plans

In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.

National Grid infrastructure within Bath and North East Somerset Council's administrative area

Electricity Transmission

National Grid has no high voltage electricity overhead transmission lines / underground cables within Bath and North East Somerset Council's administrative area.

Gas Transmission

National Grid has the following gas transmission assets located within the administrative area of Bath and North East Somerset Council:

- Pipeline: 1498
- Feeder Detail: 14 Feeder Pucklechurch / Ham Street National Grid has provided information in relation to gas transmission assets via the following internet link:  
<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

Gas Distribution

Wales and the West Utilities own and operate the local gas distribution network in Bath and North East Somerset Council's administrative area. Contact details for Bath and North East Somerset Council's can be found on the Energy Networks website: [www.energynetworks.org](http://www.energynetworks.org)

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address below:

- National Grid's commitments when undertaking works in the UK – Our stakeholder, community and amenity policy
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations – Requirements for Third Parties
- A sense of place – Design guidelines for development near high voltage overhead lines

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 274\1 S

**Respondent:** Sport England

**Representation** 1. COMMENT – Local Development Framework Evidence Base

**(soundness):** The LDF Core Strategy has made reference to Government's PPG17 'Planning for Open Space, Sport and Recreation' (ODPM, 2002). This national planning policy document states the Government's guidance

in developing a planned approach for open space, sport and recreation. This includes playing pitches, courts, swimming pools, sports halls, etc.

We have in the recent past worked with and financed the Council's Sport and Active Lifestyles team to develop an evidence base. We are aware that there is a Built Facilities Strategy and Playing Pitch Strategy. Sport England is committed to helping the Council 'refresh' this work as and when needed. This includes developing an audit of sport and recreation facilities, developing 'local standards' and 'gaps' in provision be identified. This will then led to a strategy for the provision of new and enhancement of existing sport and recreation facilities. This work should pick up cross border issues.

## 2. SUPPORT – Planning Obligations/Community Infrastructure Levy to Sport

Sport England supports use of planning obligations/community infrastructure levy as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust PPG17 evidence base. This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts.

All new dwellings in BaNES in the plan period (11,000) should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing.

There is already in place a SPD seeking planning obligations to sport (built facilities) from new housing BUT this needs to be reviewed and enhanced to include enhancements to playing fields.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 279\9

**Respondent:** English Heritage

**Representation** Delivery

**(soundness):** Heritage assets should be recognised (at 2.49 for example) as key 'infrastructure' as historic buildings, spaces and places are essential components that contribute to the quality of the local environment and are highly valued by their local community. English Heritage wishes to draw attention to the potential for promoting improvements to the historic environment, in order to support the delivery of emerging core strategy policy that relate to the historic environment. This is particularly relevant given the new emphasis given to plan making and the historic environment in PPS5 Policy HE3 '...Local Development Frameworks should set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area'.

In the context of the Community Infrastructure Levy (see CLG Community Infrastructure Levy – An overview, November 2010, and the Planning Act 2008), a wide definition of infrastructure continues to be promoted in terms of what can be funded to support the development of an area. The key areas include: Open space: as well as parks and green spaces, this might also include wider public realm improvements, conservation area appraisal and management plans, and green infrastructure; 'In kind' payments, including land transfers: this could include the transfer of an 'at risk' building; repairs and improvements to heritage assets where they are an infrastructure item as defined by the 2008 Act, such as cultural or recreational facilities.

Section 106 agreements also offer further opportunities for funding to enhance and/or mitigate the impact on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets. Significant new development in Bath will increase the use, demand and impact on the built heritage and townscape features. Is it reasonable therefore to expect development value generated by the historic environment to contribute towards its upkeep?

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 285\3

**Respondent:** Aviva

**Representation** Infrastructure Provision

**(soundness):** 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.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 299\3 S

**Respondent:** Avon & Somerset Constabulary

**Representation** Section 1e deals with Infrastructure and cross refers to requirements identified in the Infrastructure

**(soundness):** Delivery Programme (IDP Dec 2010), as well as outlining the flexible nature of this document over time. The Constabulary are pleased to see their Accommodation Project (under PFI) has been included in the IDP (DWI.23). The Constabulary have made previous representations and had dialogue with the LPA (through consultants), regarding the need for financial contributions for police resources required as a result of development. Growth, particularly housing, will impact on police resources. The police receive no funding via existing sources to support projects required to respond to increased pressures places on the force as a consequence of growth; developer contributions are a legitimate way of responding to these pressure. Such requirements are not included in the current iteration of the IDP and it is considered that the provision of additional police resources should be recognised as key infrastructure to support the district wide strategy. If the LPA consider such not be appropriate in the IDP, it is assumed that such contributions would fall to be considered under Policy CP13, Infrastructure Provision which refers to ensuring that social, physical and green infrastructure is retained and improved for communities. PPS12 para. 4.29 recognises the Police as a relevant delivery agency of social infrastructure.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 300\1

**Respondent:** Somer Housing

**Representation** Policy CP13 – Planning Contributions

**(soundness):** 6.14 We strongly urge the Council to start preparing for the implementation of CIL. This offers developer's certainty over the level of planning contributions required. It also exempts affordable housing from making a contribution. In a climate in which public funding for affordable housing and infrastructure is going to be tight we consider it is of the utmost importance that the Council moves towards this model as soon as possible; not least because the approach in the Planning Contributions SPD may fall foul of the new CIL Regulations on meeting the three legally binding tests contained in Circular 05/05.

Page 21 of 25 In the meantime the Council should amend its planning contributions policy to capture the spirit of the new CIL Regulations and exempt affordable housing from planning contributions.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 301\9

**Respondent:** South West RP Planning Consortium

**Representation** Policy CP13 – Infrastructure Provision

**(soundness):** We strongly urge the Council to implement the Community Infrastructure Levy as soon as possible. This will offer certainty to developers and should deliver more funding for infrastructure within the District. Furthermore it will provide an exemption for affordable housing to encourage the delivery of more affordable housing.

We strongly urge the Council to follow the Government's clearly stated policy on paying for infrastructure by exempting affordable housing from making planning contributions until CIL is introduced.

The above comments are intended to be constructive and we would like to be involved in future consultations as the LDF progresses. Please ensure that the South West RSL Planning Consortium is listed as consultees with Tetlow King Planning as its agents.

Yours faithfully

JAMIE SULLIVAN

For and On Behalf Of

TETLOW KING PLANNING

Enc Representation Forms;

South West RDA - Economic Prediction and the Planning Process - A contribution to the current debate about regional planning for housing need after the recession;

South Hams Inspector's Report.

cc: Guinness Hermitage Trust

Green Square Group

Jephson Housing Association

Knightstone Housing Association

Aster Group

Spectrum Housing Association

Somer Housing Association

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 307\4

**Respondent:** SWAN

**Representation** The document make reference to the 'Community Infrastructure Levy' but further clarification is  
**(soundness):** required of how this will benefit the communities impacted and the mechanism for them to influence decisions made on the provision of infrastructure.

**Change sought to** Clarification of what a 'Community Infrastructure Levy' is  
**make sound:** How existing communities will be able to benefit  
How communities can have a say in infrastructure

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 313\1

**Respondent:** Richard Andrews

**Representation** 3. Key Strategic Issue (1.12), 'Growth', and the transport infrastructure.  
**(soundness):**

4.(2)The Core Strategy is unsound.

5.(2) The Core Strategy is unsound because it is not effective.

6.(b)Why the Core Strategy is unsound:

You are proposing 6,000 new homes in Bath, perhaps 20,000 new Bath inhabitants(a 20% increase in population over the planning period)and which will necessitate a 45% annual increase over present numbers in the provision of new homes (1.33 Delivery). You state these increases are necessary to support the natural increase in population, and in addition to provide homes for the proposed 8,700 new jobs in Bath,this based on the Council's Economic Strategy (1.33). I have reviewed the Strategy's approach to vehicular traffic in Bath in terms of:visitors and commuters; through traffic, and residents.

Visitors and commuters: Key Strategic Issue 1.12states your expressed need for 'the necessary supporting infrastructure in place', tomake your proposed 'Growth' sustainable. An examination of '2G, Infrastructure and Delivery' shows this will not be the case. Table 5, Bl.1 lists a number of measures to improve transportation. The expansion of park and ride sites will be of use only if fully utilised, but the Strategy does not indicate the utility of existing park and ride sites. 'Safe routes for pedestrians and cyclists' will do nothing to improve access to and from Bath, and the 'Other essential transport links and improvements' are left unspecifiedand so are irrelevant. Furthermore, these transportation initiatives are only in discussion (Table 5).Similarly, improvements to the train service to Bristol (Bl.4) are dependent on financing by the Rail Industry. The Council is giving no financial commitment to these transport infrastructure improvements.

Through Traffic: Core Policy 6F, 6.94 states 'the B&NES highway network remains heavily trafficked highlighting the need ...to minimise the adverse effects of traffic...'. I agree, but would go further and say that improvements are essential to improve current access to/from and in and around the city, let alone the proposals set out in Key Strategic Issue (1.12), 'Growth'. The Council's response to this, in 6.94, is to study the needs for bypasses!

Further,Core Policy 6F, 6.100, Climate Change and Air Quality, talks of 'influencing travel behaviour and managing travel demands', as if the Council will wave a magic wand and change people's lifestyles to

reduce traffic pollution.

Residents: the proposed nearly car free city centre is desirable and as a resident I fully support this initiative. Residents, however, use their cars for trips in Bath outside the city centre and for trips from and to Bath. This will not change, and it is reasonable to suppose the 20,000 proposed new residents will have similar requirements for car usage. Further, 2G Infrastructure and Delivery, 2.49, talks about 'encouraging car club sharing' and 'working from home' as measures to reduce traffic flow in Bath; this is wishful thinking, not a strategy. The Strategy, therefore, offers only increased congestion to residents.

Summary: The proposals for traffic infrastructure in 2G in the Strategy, both minimal and uncommitted, cannot be said to make any significant difference to existing traffic patterns and congestion in Bath outside the Central Area, and critical areas, such as an A46/A36 link (6F) have been virtually ignored. A 20% increase in the city's population would greatly exacerbate the city's existing traffic issues. The Council, while determined to push through its plans for 'Growth', is paying lip service only to the need for an essential supporting traffic infrastructure.

7.(b) Changes required to make the Core Strategy sound:

Assessments must be made of the traffic infrastructure required to support expansion of the city and incorporated into the Core Strategy, so that expansion is contingent on the availability of an adequate traffic infrastructure. Such assessments must include, at a minimum: the feasibility of the A46/A36 link; and an examination of the usage of park and ride sites, to assess to what extent expansion of these sites will reduce traffic flow in out of Bath.

**Change sought to make sound:** Assessments must be made of the traffic infrastructure required to support expansion of the city and incorporated into the Core Strategy, so that expansion is contingent on the availability of an adequate traffic infrastructure. Such assessments must include, at a minimum: the feasibility of the A46/A36 link; and an examination of the usage of park and ride sites, to assess to what extent expansion of these sites will reduce traffic flow in out of Bath.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 321\2

**Respondent:** Northern Racing

**Representation** Objective 6 seeks to promote health and well being including encouraging social interaction and the **(soundness):** timely provision of recreational and leisure facilities. Northern Racing supports this objective, but do not feel that the Core Strategy policies which follow provide adequate support and encouragement to improve existing social interaction, recreation and leisure facilities such as Bath Racecourse. Certainly, there is no reference in proposed Policy CP13.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 384\3

**Respondent:** Wiltshire Council

**Representation** Wiltshire Council supports the approach to align new development with infrastructure and recognises **(soundness):** that this will enable B&NES to ensure the delivery of sustainable patterns of development. Given the strong functional relationships that exists between Bath and Wiltshire towns it is vital that transport infrastructure is planned and delivered in consultation with neighbouring authorities including Wiltshire Council. Core Policy 6G does not include reference to adjacent authorities and the need to plan comprehensively with partners on cross-boundary issues. A commitment to cross-boundary working where circumstances permit should therefore be acknowledged within Core Policy 6g.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**