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Simon Emerson HMI.

Dear Mr Emerson,

B&NES Core Strategy.
SHMA Hearings 10th & 11th December 2013.

South Stoke Parish Council has not felt able to comment before on the SHMA & SHLAA calculations, because we do not have the expertise amongst our Members and could not afford to pay for professional help.

However, in their latest Schedule of Core Strategy Amendments and in their recent correspondence with you, BANES have for the first time revealed figures which are clearly understandable to a 'Lay Person'. We would therefore like to comment on para 3.33 of your letter to them ref ID/42.

We note that the Total Housing Requirement for BANES Council area, calculated from an objective assessment of Need plus the Local Plan Backlog is now assumed to be 8727, of which 3290 [approx 38%] are required as Affordable Homes. We also understand that BANES now propose to increase the number of Market Housing sites available by a dramatic 77% to 9646, in an attempt to encourage the building of more affordable homes in Green Belt Areas, because they appear to have allowed under provision on many of the currently planned Brownfield sites.

We believe the current proposals are fundamentally flawed and though Green Belt, AONB, WHS and other issues will be considered by you at later hearings, we note that the root of the problem is clearly in these calculations and assumptions.

The Core Strategy allows for adequate provision of sites to meet the entire Housing Need [8727 units] without any necessity to start the process of ruining the important Setting of Bath as a World Heritage Site, ignoring the principle purposes of the Green Belt and the Statutory protection that should be afforded to the AONB & Wansdyke SAM.

All that is required is a modest adjustment of the percentage of affordable housing required on sites for which Planning Permission has yet to be granted and the controlled release of other developable land in BANES ownership, together with a realistic pursuit of housing supply in the neighbouring Authorities of Wiltshire and Somerset, which are already linked to Bath by sustainable transport systems.

South Stoke Parish Council does not wish to attend your meeting on 10/11th December but asks you to consider these issues carefully, before allowing this mistaken assessment to colour all future discussions. We would wish to return to this subject at your planned meetings in March & April next year.

Yours faithfully,

Robert Hellard.

Vice Chairman. South Stoke Parish Council.