

Bath and North East Somerset Council Draft Core Strategy

REPRESENTATIONS BY RESPONDENT

Bath and North East Somerset Council - Draft Core Strategy - Representations by Respondent (Numbers 301 to 400)

Respondent Number: 301 Respondent: South West RP Planning Consortium

RepresentationReference: 301\1

Plan Reference: Chapter 1: The Spatial Vision

Representation 1b Spatial Portrait & Key Strategic Issues Key Strategic Issues

(soundness): In the profile of each sub-area in the Core Strategy the lack of affordable housing is highlighted as a key issue. However, this is not reflected in the list of overall 'Key Strategic Issues' for the District. The need for affordable housing (863 new affordable dwellings per annum) should be acknowledged in this section. We welcome the Council's recognition that the population of BANES is ageing and that this brings new and unique challenges for the District.

1c Spatial Vision and Strategic Objectives

Spatial Vision

The Spatial Vision makes no mention of the need to improve housing affordability in the District over the Core Strategy period. Given the scale of the need we consider that the Council should be aiming to 'improve housing affordability in the District' and 'increase the supply of affordable homes'.

Strategic Objectives

We support the Council's objective of 'meeting housing need'. However, it is not possible to meet this objective without releasing greenfield land (stated in objective 2) or by setting the overall housing target over the plan period as low as 11,000 new homes.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 301\2

Plan Reference: Chapter 1: Vision and District-wide Strategy

Representation 1d District-wide Spatial Strategy

(soundness): Policy DW1 – District-wide Spatial Strategy

This policy makes provision for 11,000 new homes and 8,700 new jobs in the District between 2006 and 2026. This includes a target of 3,400 affordable homes. We consider that this is insufficient to meet the District's housing needs and will lead to worsening housing affordability in what is already one of the least affordable areas of the country outside of London.

We note that the most recent CLG projections (2008) show an increase of 14,000 new households between 2006 and 2026. This is less than the 19,000 household increase indicated by the 2006 projections. However, the total increase for the West of England sub-region as a whole has not changed, based mostly on a large increase in household growth for Bristol making up for smaller projected increase in BANES.

The RSS Proposed Changes figures were based on previous similar figures. Despite the overall levels of household growth staying the same for the West of England, our research, on behalf of the National Housing Federation shows that all four authorities have cut its housing targets by 44,000 dwellings in total from those in the RSS.

Whilst it is accepted that the economic growth projections used in the RSS have changed since the recession, research from the South West RDA suggests that this could only justify a cut of around 5% in the RSS housing targets (document enclosed). However, the currently proposed cuts in housing targets in the West of England amount to a reduction of 38% from the RSS. The amount of homes currently being planned for in all four Core Strategies is nearly 20,000 dwellings less than that agreed by the Councils in the draft RSS (before the enforced increases by the Panel Report and Secretary of State Proposed Changes). It is clear from this that there will be an underprovision of homes in the West of England. The authorities in the sub-region are extremely interconnected, especially Bristol and BANES and we therefore do not consider that the Council can look at economic and household growth for the authority in isolation. This does not represent good spatial planning in accordance with PPS1.

Even looking at the evidence for BANES alone we consider that the housing provision should be increased. The economic growth forecasts used by the Keith Woodhead study are pessimistic and do not reflect aspirational growth for the District. We consider that they will be a self-fulfilling prophecy and inhibit economic growth above that figure. Furthermore, they do not take in to account previous under provision of housing in the District. The SHLAA states that the Council is likely to fail to meet its Local Plan housing target by nearly 1,000 homes.

Worsening housing affordability will also have a very detrimental impact on the Council's aims to 'pursue a low carbon and sustainable future'. The Council already acknowledge that within Bath 'The housing market is particularly expensive to penetrate and this contributes to a dislocation of workers from workplace and exacerbates the level of in-commuting from lower cost locations'.

We have already highlighted above how the proposed housing target will only worsen housing affordability. This will lead to more in-commuting from areas further afield, such as Peasedown and the Somer Valley.

New Homes Bonus

The reduced housing target will also have significant financial implications for the authority. The reduction from 15,500 dwellings to 11,000 dwellings will cost £41.5 million in funding from the New Homes Bonus and £94.7 million from the RSS target of 21,300.

Recommendations

We strongly urge the Council to return to the 15,500 dwelling target in order to address housing affordability issues in the District and explore returning to the 21,300 dwelling figure to address the wider needs of the sub-region.

Change sought to Recommendations

make sound: We strongly urge the Council to return to the 15,500 dwelling target in order to address housing affordability issues in the District and explore returning to the 21,300 dwelling figure to address the wider needs of the sub-region.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 301\3

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation 5b Rural Areas

(soundness): Policy RA1

We welcome the inclusion of a policy solely for rural areas where the sustainability of the settlement needs to be properly considered. However we are concerned about the inclusion of a policy which requires local community support for schemes to progress. This would amount to a power of veto over

all new developments in rural areas. We consider that the new Neighbourhood Plans will give local residents ample opportunities to shape development in their area.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 301\4

Plan Reference: Policy RA4: Rural Exception Sites

Representation Policy RA4

(soundness): We strongly support this policy which acknowledges the need for cross-subsidy for rural exception schemes without public subsidy. Lack of public subsidy is a very significant issue for our members when delivering their own schemes and we are pleased to see the Council is putting policies in place to deal with this. However, a flexible approach will be required on all types of schemes delivered by housing associations in the current climate, not just rural exception schemes.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 301\5

Plan Reference: Policy CP6: Environmental Quality

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:

RepresentationReference: 301\6

Plan Reference: Policy CP8: Green Belt

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:

RepresentationReference: 301\7

Plan Reference: Policy CP9: Affordable Housing

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:

RepresentationReference: 301\8

Plan Reference: Policy CP10: Housing Mix

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:

RepresentationReference: 301\9

Plan Reference: Policy CP13: Infrastructure Provision

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
Somerset Housing Association
Sovereign Housing Association
Housing Enabling Officer: Adrian Holloway

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 302 Respondent: Paul Karakusevic

Representation Reference: 302\1

Plan Reference: Policy B2: Central Area Strategic Policy

Representation (soundness): I am concerned that diagram 8 page 42 appears to propose that the current central area be extended by 2026 to include the Recreation Ground and Johnstone Street as part of a city centre extension.

I am concerned that the correct legal and planning justification for this has not been complied with. Rezoning land to benefit B&NES corporate requires more probity and planning/legal justification than has been provided

This rezoning if allowed to happen could have far reaching implications on any future licensing and planning applications for an area which is currently residential only and green open space. The financial gain of rezoning brings into question the impartiality of B&NES in their motives for rushing this through

This rezoning pre-empts the public consultation on uses of the Rec, it ignores the existing covenants which deny commercial development. It also pre-empts the Charity Commission decision regarding the Trusts' uses of the Rec.

It also suggests that Johnstone street is an existing access to the Rec. This is not the case the street has existed as a cul de sac with no access to the Recreation Ground for 200 years

**Change sought to
make sound:**

Representation (legal compliance): BANES Council have sought to regard the Rec and certain residential streets within the PERA area as "commercial" in the latest version of its Core Strategy, thereby giving further credence to the development of commercial activities on the Rec, and in neighbouring residential areas.

As you know it is the 1956 conveyance that appears to govern how the Trust should be run. This conveyance refers to the Conveyance dated April 1922 which imposes on the parties to the 1956 conveyance an obligation "to observe and perform the covenants and conditions contained in the April 1922 conveyance"

The April 1922 conveyance contains a covenant binding on ANY future owner of these specific

premises (the current Rec land) that "there will be no buildings for the purposes of trade or business which may be a nuisance, annoyance or disturbance or otherwise prejudicially affect the adjoining premises or neighbourhood." This seems to be clear that whoever owns the land, and regardless of any land-swap, that these conditions should be upheld.

B&NES have not provided adequate justification for the rezoning of either the recreation ground a green space or Johnstone Street a residential street.

The document is not labelled correctly, the Recreation Ground is a green open space which has been used as such for 200 years. The inspectorate should not be misled about the nature of the space which the Council is currently seeking to rezone. The space is green, open, recreation ground space.

Earlier drafts of the strategy have not sought to rezone this area, the current proposal has just appeared in the core strategy without any background justification or local consultation.

They have presented misleading documents at various consultation events regarding the status of Johnstone Street which is currently a residential cul de sac.

Change sought to make legally compliant: Compliance with existing covenants pursuant to the Recreation Ground. Maintain current status of the Recreation Ground, and Johnstone Street as residential

Respondent Number: 303 Respondent: Mendip District Council

Representation Reference: 303\1

Plan Reference: Chapter 1: Vision and District-wide Strategy

Representation (soundness): A. Strategy Clarity - Policy DW1 sets an overall housing requirement of 11,000 new homes in the period 2006-2026. The justification for this limited level of provision is not adequately argued in any part of the publication document. As an observation first of all, this represents an approach which gives the average person little chance of understanding the complex issues that BANES has to address and fuels populist criticism of the planning process which over the recent past has resulted in a failure to properly plan. This in turn has resulted in implications for the surrounding Mendip and Wiltshire market towns.

B. Insufficient Housing - The substantive issues raised are based on the implications upon housing markets and travel patterns within Mendip District. Mendip District Council has predicated its emerging planning strategy upon improving self containment of its main centres by supplementing additional housing to meet local employer needs and limiting housing growth where new supply would exacerbate commuting demands.

With Bath, as an economic centre, being such a close neighbour it is critical for this strategy that BANES plans, more effectively than has been achieved in the past, to deliver a higher proportion of its housing needs to prevent further extensive growth in travel demands and further pressure on adjacent housing markets.

Two areas below highlight examples of housing provision that have not adequately been addressed.

A) Lack of evidence base which is informed by those with a stake in the area – BANES makes its case for the level of housing proposed in hidden away studies which do not appear to have benefited from any engagement with wider stakeholders. PPS3 seeks a broad ranging engagement by local planning authorities in planning for housing taking a sub-regional approach.

The autumn 2009 options consultation gave an impression that BANES intended to move much further in providing for a level of housing appropriate to its needs (given chronic undersupply in previous plan periods). It has therefore been surprising to find that the authority has so markedly revised down its proposed level of housing. Given such a fundamental change to the final direction of the Authority's strategy has been made at the point of publication, with little information publicised to stakeholders (in this case a neighbouring authority and fellow West of England partnership authority), it would

appear that a whole range of stakeholders will not have been engaged in this process and now find themselves having to make representations (and the other bureaucratic arrangements associated with the Examination process) which the Planning Inspectorate will have to resolve.

B) The Housing Requirement is not backed up by robust facts - The September 2010 Woodhead Stage 2 study represents a well argued case for pursuing a housing requirement purely predicated on job led household growth which is reasonably justified by the Oxford Economics and Roger Tym & Partners employment growth data. It advocates an 11,600 home requirement based on a central scenario – already 600 homes in excess of the Core Strategy’s housing requirement. However, the Woodhead study appears to indicate that wider population data should simply be set aside because of its unreliability over time and because it simply extrapolates trends forward. To some extent these reasons are accepted as demand must be set apart from need. However, there are some elements of population growth which cannot be overlooked in such a dismissive manner. Two of these are explored below.

A. Household size and the aging demographic. At 2006 the estimated population using baseline data in the West of England SHMA was around 175,600 contained within around 74,100 dwellings - a simple division of the two offers a typical household size of 2.37 persons. Work in adjacent Mendip whose population structure is marginally older projects that by 2026 this ratio will fall by around 0.2 persons per household (and more in some parts of the district) with the major driver being aging population. Hence, in applying a discounted reduction in the BANES ratio (compared to that of Mendip) of 0.17 one could indicate that by 2026 BANES ratio would be in the region of 2.20 persons per household. Without looking at any projected growth and simply applying this ratio to the 2006 population (i.e. $175,600 / 2.20$) 79,800 dwelling will be needed – a total of 5,700 new dwellings. This would be additional – less any subcomponent already built in – to the 11,000 proposed. Even using a more conservative 2.25 ratio the level is 3,500 additional dwellings.

Therefore it is argued that to supplement economically driven growth, the natural growth of the existing household level needs to be better reflected in the areas housing proposals. If this is not addressed the economic growth expected from projected job creation will only fuel travel demands and pressure on adjacent sub-housing markets including those within Mendip

b. Student populations – The educational role that Bath plays is important to its diversity as a place and offers opportunities for Mendip residents who can reside in the district and travel into Bath. However, considerable proportions of students – largely for the lifestyle and freedoms from the family home – move away and reside near to their chosen university. BANES has produced an assessment of the impact that expansion at the two universities over the plan period will have in terms of HMOs and other accommodation needs – including measures to reduce issues arising. However, the study appears to have two flaws. Firstly, the measures proposed to deliver more student accommodation were advocated prior to the government’s cuts to higher education and so certainty over deliverability is untested. (One could suggest that this would be balanced out by a potential reduction in student numbers arising from the rise in tuition fees however it is considered that the popularity of Bath’s universities and environment insulate it to some degree from falling demand). Secondly the work acknowledges that since 2006, an additional 3,500 students have been added to the two establishments yet this is not factored into the total supply scenario – i.e. what already happened is being overlooked and not reflected in the total supply picture. Taking the view that much of the new accommodation will not be able to be funded there is the potential need for between 3,000 - 4,500 units of accommodation (using both elements above) which using the established 4.5 students per dwelling average set out in the study suggests demand from this population sector would be 600-1000 dwellings. Again this is in addition to the 11,000 level set out in the draft Core Strategy

These two example illustrate that the latent need – setting aside aspirational demand – is some way in excess of the level of housing proposed when added to measured job growth led requirement and that the authority needs to withdraw its strategy to more adequately consider the full housing supply issues.

C. Deliverability - Even assuming that the target provision proposed by BANES is acceptable – which is questioned above - there is a full awareness that the deliverability of housing across the authority area has been chronically poor. The 2010 SHLAA document underlines the poor performance under the current Local Plan in achieving target provision since 1996 and periods prior to that reflect similar patterns.

The BANES Strategy is predicated on Brownfield Land delivery which, given the city's heritage and setting is accepted to be reasonable. However given that this strategy has been unable to deliver housing at appropriate levels in the part, some contingency plan needs to be in place. Whilst now defunct as an entity, the RSS process did require BANES to look at peripheral greenfield development areas around Bath and did conclude that there were some areas available which did not ultimately harm the city setting. The shifting views of English Heritage in this matter are noted, however in planning for a prosperous future, design quality and appropriate controls over sensitive landscapes can ensure that the city's past is not compromised.

D. Transport – acknowledging the existing travel flows to and from BANES and the pressures that this puts on the highway network, rail and bus services it would be appropriate for transport planning to address capacity, quality and frequency issues related to public transport. The emerging Mendip Core Strategy policy for Frome highlights this as a major opportunity that cross boundary working with BANES and Wiltshire can address. This same matter could be built into the Somer Valley Vision and Infrastructure and Delivery section (p.79 and para 4.26)

Change sought to make sound: Housing issues (A-C) - Section 6 sets out areas where the full range of household growth needs do not appear to have been addressed.

However, without the resources or ability to rerun technical work for an area outside the authorities remit it would be impossible to set out a precise change to recommend or be appropriate to make judgements about the absolute and relative constraints that need to be balanced up.

As a result, Mendip District Council would need to be satisfied that the components of housing growth were more adequately explored and explained. Based on some of the issues considered in 6b) above a more appropriate level of supply would be closer to that proposed as the "Option 1" draft RSS level than that set out in the Publication draft – i.e. greater than 13,500 - picking up a proportion of the growth emerging from falling household size and a reflection of the student population's housing needs as cited along with any other specifics.

Furthermore, and in whatever eventuality as regards numbers, a component of housing land must be provided which is not subject to considerable uncertainty – i.e. uncertain MOD relocation/ consolidation programmes, greater HMO controls (against the backdrop of Further Education funding cuts) and so on. BANES, more than any other district must be able to clearly show that development can be achieved in a timely and consistent manner (acknowledging the vagaries of the market). Whilst accepted as a sensitive issue, a greenfield extension offers the best opportunity in this respect.

Transport (D)

DW1 and associated text – reflection of the (public) transport improvements to facilitate traffic reduction to the south and east of the city

Somer Valley Infrastructure and Delivery (paragraph 4.25) - The list of desirable infrastructure requirements should make reference to improving cross-boundary public transport links. This may include bus services to towns such as Frome, Trowbridge and Warminster which could be achieved through partnership working with neighbouring authorities.

Representation (legal compliance): Whilst not raised as a formal failing, it is questionable whether the authority has adequately engaged key stakeholders during the preparation process – notably in the post RSS period during which the new government has indicated the intention to introduce a "duty to cooperate"

Change sought to make legally compliant: In an ideal world, withdrawal of the plan and proper engagement on its content to build some form of consensus prior to republication or submission would benefit all parties and

reduce the burden on the Examination process.

Respondent Number: 304 Respondent: Bath University

RepresentationReference: 304\1

Plan Reference: Policy B5: Strategic Policy for Bath's Universities

Representation UNIVERSITY OF BATH: CORE STRATEGY REPRESENTATION

(soundness): Policy B5

General Comments

1. The University of Bath (the University) welcomes the good progress Bath & North East Somerset Council (the Council) is making with the preparation of the Draft Core Strategy (DCS). This document is critical in terms of setting out the long term spatial vision for the area, and will play a key role in guiding future development in and around the City.

2. The process that the Council has been through in the preparation of the draft DCS appears robust, and the draft DCS's provisions generally reflect the objectives and policies of national planning policy statements (PSS). In particular, we welcome the recognition of the importance of the University to the city and wider area. We consider the DCS to be sound in that its provisions are generally justified, effective, and conform with national policy.

3. The University does have some specific concerns with Policy B5 of the DCS. However, those concerns do not go to the heart of the DCS, and can be relatively easily addressed through minor amendments as highlighted below. The University is of course very willing to assist the Council in taking the DCS forward, including the provision of data to inform the evidence base that underpins it.

The University

4. The University has been located in Bath since 1965, and has grown from being a small institution with around 5,000 students to a world class university with over 14,000 students and around 2,600 staff. Today the University plays a significant role in the city and wider area in terms of its academic offering and contribution to economic development and social well-being. 5. The University ranks highly in the league tables of UK universities published by a number of national newspapers. It is a research-intensive university with a reputation for academic excellence in both research and teaching and has a track record of working in partnership with business, the public services, and the voluntary sector. It specialises in the STEM subjects, science, technology, engineering and mathematics, supporting the UK's knowledge-based economy. It is also recognised as a sector leader in technology transfer.

5. Consequently, the University attracts the most able staff, researchers and students from the global Higher Education recruitment market who interact with the business community in a mutually sustaining manner, encouraging innovation and enterprise. This assists the area's economic development through the creation and growth of knowledge-based, high value-added companies

6. Moreover, the University brings many wider economic benefits to the area. Not only is it a major employer in itself with around 2,600 staff, it is estimated that each full-time student spends over £4,000 per annum, amounting to some £48 million for approximately 12,000 full-time equivalent students. The University of Bath has estimated its current economic impact on the City of Bath to be approximately £150 million per annum. The University of Bath has a turnover in excess of £185 million at 2011.

7. The University also provides access for the local community to world-class sports, social and recreational facilities on the campus, and interacts further with the community through outreach activities, including mentoring schemes with local schools, and students' fundraising and volunteering activities.

The Future

8. The Government's policy on Higher Education provision is rapidly evolving, notably in respect of student funding and social mobility. The implications for the University, and the Higher Education sector more generally, will become clear over the next few years. In the first instance, the University is awaiting sight of the new White Paper on Higher Education which is due to be published in the next couple of months. What is apparent, however, is that the University needs to continue to strive for teaching and research excellence in an increasingly competitive market, whilst also ensuring long term financial sustainability. To this end, it will have to continue to meet the expectations of its students, which are likely to rise as tuition fees increase.

9. Central to that is the continued effective management and development of the University's estate, through continued investment in refurbishing some of the ageing buildings on the campus and in the creation of new facilities. To that end the University has prepared a Masterplan that demonstrates how further campus development can be achieved whilst enhancing the environment for students, staff and visitors.

10. The Council has a critical role to play in supporting the University to realise these aims and aspirations for the benefit of the area as a whole. Most notably, in terms of the University's estate through the provision of a positive planning policy context that allows the expedient determination of future planning applications for key investments planned and highlighted in the University's Masterplan.

The Core Strategy

11. The University, therefore, welcomes and supports the recognition in DCS Objective 3, Policy B1: Bath Spatial Strategy, and Policy B5: Strategic Policy for Bath's Universities that the spatial strategy should seek to enable the provision of additional teaching and research space and student bed spaces to facilitate the growth of the University, and in doing so encourage economic development.

12. The University also welcomes the saving of adopted Local Plan Policy GDS1/B11, which establishes key development principles for the campus. The policy recognises the need to address the sensitive environmental context without unduly hindering the further development of the University's estate.

13. Policy B5 could sit comfortably together with Policy GDS1/B11 to provide an appropriate policy context for the determination of future planning applications for development on the campus. It is suggested, however, that in order to properly reflect Objective 3 and Policy B1, Policy B5 should be more positively framed to effectively facilitate the development required to meet the University's needs. That is, it should include an explicit statement of support for the development and expansion of the University as illustrated in the Masterplan, and promotion of links with other key stakeholders in the city.

14. It is suggested that Policy B5 and its supporting text in Section 2f is currently too heavily focussed on the issue of the provision of student bed spaces and the implications for Houses in Multiple Occupation. Whilst the Council's concern in this respect is appreciated, and it is accepted that further provision of student bed spaces is required, this is only one of many development issues the University will need to address through the plan period. As stated above, the University needs to provide additional academic and related floorspace, as well as student bedrooms to accommodate anticipated growth over the next 10-15 years.

15. The case for further development on the campus is clear. The historic growth in student numbers has resulted in a 50% reduction in the area available per student since 1990. Moreover, whilst it is not expected that the University will continue to grow at historic rates, further development is necessary if the University is to contribute towards the national priorities for higher education provision, retain its current status as a top 15 University, and continue to perform its critical social and economic

development role within the city and wider area. In an increasingly competitive recruitment market, and with student expectations raised by higher tuition fee levels, it is essential for the University to ensure that the teaching and research environment provided is of the highest quality, and befitting of a leading University. .

The Adopted Local Plan

16. The requirement for the University to maximise the development potential of its land holdings in order to meet the needs arising from its continued development is acknowledged in the Local Plan that was adopted in October 2007. Indeed, the Public Inquiry into the Local Plan resulted in the removal of parts of the campus from the Green Belt to allow further development. Policy GDS.1/B11 identifies the campus as a "General Development Site" and requires the preparation of a comprehensive Masterplan to guide the anticipated development in the plan period to 2011. The policy requires that the Masterplan provides for the comprehensive development of its estate to provide 43,250m² of university related development and 40,000m² of student residential accommodation, whilst protecting environmentally sensitive features and areas, ensuring high quality design and the implementation of an integrated transport solution.

The University Masterplan

17. Following the adoption of the Local Plan the University prepared the required Masterplan for the University estate that addressed the matters highlighted in the policy. The Masterplan is underpinned by an extensive evidence base that investigated the development potential of various sites within the campus. Following an extensive stakeholder and public consultation exercise, it was submitted to the Council for their consideration in 2009.

18. The preparation of the University's Masterplan highlighted that the principal challenge is one of accommodating the scale of development required, whilst not adversely affecting the inherent qualities of the existing campus or inappropriately impacting upon the surrounding area. Evidence presented to the Local Plan Inquiry by the University included an analysis of the development capacity of the campus, highlighting appropriate locations for future development. The Inspector largely agreed with its conclusions, but also identified additional areas where he thought there was capacity for further built development. The Inspector also identified areas that he thought should be protected, and they are specifically referred to in the Local Plan policy. The Masterplan has directly responded to these conclusions. Consequently it seeks to focus development into areas of lesser environmental quality, so that new development can realise improvements in the amenity of the campus environment.

19. Since the submission of the Masterplan in 2009, the University has continued to engage with key stakeholders in the area. The University now proposes to make some relatively minor amendments to the Masterplan to address the specific concerns raised. However, it recognises that it may have to revise its priorities in response to the evolving HE market and new Government initiatives.

Future Growth & Development

20. The quantum of development required to accommodate the anticipated growth of the University was considered in great detail at the Public Inquiry into the Local Plan that resulted in the removal of parts of the campus from the Green Belt to allow further development. The Local Plan, however, could only plan for development within its plan period to 2011, and that is reflected in the provisions of Policy GDS1/B11. A similar level of development is referred to DCS Policy B5 for the period to 2026, and some explanation is provided in the "Student Numbers & Accommodation Information Paper", which seems to rely on the draft Masterplan submitted to the Council in 2009. The University does indeed need to take a long term view to ensure effective site and financial planning in response to the anticipated development requirements. The submitted Masterplan, therefore, looks to 2020 and includes provision for a greater amount of development.

21. There is, therefore, some disparity between the various documents that needs to be clarified in the revised Masterplan. However, accurately predicting future growth and development needs over such a

long period of time is of course very difficult, particularly in light of the changing policy and economic context within which Higher Education is provided in the UK. In the absence of clarity about the new methodology that the Government is developing to control full-time Home/EU undergraduate numbers, and the likely impact of new visa regulations on international recruitment, it is considered that the figures included in DCS Policy B5 are appropriate for the foreseeable future, and are provided for in the University's revised Masterplan which will shortly be resubmitted to the Council.

22. Given the current uncertainty there does, however, need to be flexibility in how the Masterplan is implemented, i.e. the phasing and timing of the delivery of the required academic floorspace and student bed spaces.

23. Paragraph 2.38 of the DCS refers to the need to identify additional capacity on the campus to accommodate growth beyond 2020 on the campus, and the intention to retain the existing Green Belt boundaries. Whilst that is understood, and the University supports the apparent focus on on-site campus development, when considering potential needs over such a long timescale the University would not rule out the potential to extend the campus for compatible related uses in order to facilitate future growth within the existing campus boundaries.

Policy B5

24. As stated, above The University would like to see Policy B5 be more positively expressed to facilitate the development required to meet the University's needs. That is, in order to properly reflect Objective 3 and Policy B1, it should include an explicit statement of support for the development and expansion of the University and promotion of its links with other key stakeholders in the city.

25. In doing so the policy should clearly refer to the University's Masterplan, which has taken considerable time and resources to prepare and has been the subject of extensive stakeholder and public consultation. The Masterplan is a critical planning tool in providing an appropriate framework for the future development of the University, and should be acknowledged as such in the policy.

26. In that way Policy B5, in tandem with Policy GDS.1/B1, will ensure that the Masterplan can be effectively implemented through the expedient determination of future planning applications, allowing the constituent elements of proposed development to be delivered as and when necessary.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 305 Respondent: JPC Strategic Planning and Leisure Ltd

Representation Reference: 305\1

Plan Reference: Diagram 17: Radstock Town Centre

Representation (soundness): We support the existing proposals for housing development in the Somer Valley area, however, believe the existing policy area for Radstock is too narrow to deliver the stated objectives. The 'potential areas for change' outlined, also limit the options for development. The current policy area excludes land on the fringe of the proposed policy area which has already been demonstrated to offer sustainable options for housing development through the SHLAA.

Change sought to make sound: The policy area for Radstock should be extended so that further opportunities for housing and development can be sought outside of the immediate vicinity of the town centre.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 306 Respondent: Bath Tourism Plus

RepresentationReference: 306\1

Plan Reference: Paragraph 2.04

Representation (soundness): Dear Mr Trigwell

Core Strategy Consultation

I am writing on behalf of the Board of Directors of Bath Tourism Plus (BTP) in response to the publication of the Draft Core Strategy.

Background

The visitor economy is a key contributor to the prosperity of Bath and North East Somerset earning £330m p.a. and supporting 8,200 jobs. It receives 850,000 staying visitors and 3.5m day visitors. BTP is very supportive of the overall emphasis and direction of the Core Strategy and welcomes the recognition given to the economic contribution made by the tourism sector. In particular it supports the following statements:

- The strategy for the city must sustain the critical contribution of tourism to the economy. This means protecting and enhancing the characteristics that make the city special and ensuring that an appropriate level and range of visitor accommodation is maintained.
- The conservation and enhancement of the World Heritage Site (WHS) and its setting must be reconciled with contemporary socio-economic and environmental challenges, including climate change. Bath's WHS status and environmental quality is not an obstacle to economic growth – it is part of a strong 'brand', an incentive to and enabler of growth – however it does require that contemporary change is managed sensitively and that high quality design is achieved.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 306\2

Plan Reference: Paragraph 2.04

Representation (soundness): In 2007 the B&NES Destination Management Plan (DMP) confirmed that Bath should focus on growing the economic contribution from visitors by developing the staying visitor market. The DMP identified accommodation supply as a constraint on growth and recommended a detailed study to inform planning decisions.

In 2009 the B&NES Accommodation Study confirmed the need to increase the number of rooms available to visitors. BTP accepts the recommendations of the B&NES Accommodation Study on the scale of supply needed to 2026. We welcome the fact that the Core Strategy recognises this need and makes provision for growth. BTP's view is that action in relation to accommodation supply is a priority and that failure to act will have the following implications for the destination:

- It will constrain the growth of leisure and business tourism.
- People may still visit Bath but stay elsewhere, adding to congestion without bringing wider economic benefits.
- An opportunity will be lost to create employment and jobs and add to economic diversity.
- An opportunity will be lost to complement related strategies. For example, the B&NES Retail Strategy emphasises the importance of refreshing the offer and achieving a mix of independent and mainstream provision. Improving the range of accommodation means that we can offer a complete experience to

the visitor. Investment in upgrading visitor attractions, such as the Holburne Museum, will not be maximised and the opportunities created by developing events will be constrained by limited supply of rooms.

Now that we are unified in our view about the need for development, it is important to ensure that this growth is managed and that we collectively deliver the vision outlined above of sustainable development and well considered, high quality growth.

The Accommodation Study advocated that B&NES should be clear in stating the type of development that is right for the market and BTP fully supports this recommendation. Our view of priorities is as follows:

1. That priority should be given to bringing a conference facility on stream. This will need to be opportunistic, but if it can be realised by working with a hotel operator, then this should be encouraged. This will bring benefit to all accommodation providers in Bath and make better use of the existing infrastructure.
2. A four star internationally branded hotel – especially if a prospective operator can provide conference facilities as part of the development.
3. Boutique hotels – independent and branded
4. Branded budget provision – to be developed on peripheral sites

The study identified the fact that there is strong interest from developers and we need to work together to ensure that high quality development is what is delivered. We recognise the constraints in the planning system, but look to B&NES to exercise leadership in shaping the city in line with the aspirations in the Core Strategy. As the Accommodation Study said,

Planning policies alone are a blunt instrument for determining the scale, shape and mix of accommodation development. If the Council wants to directly influence the shape and size of the accommodation offer it will need to take a more pro-active role in terms of targeting selected hotel operators and developers, allocating sites for hotel development in the City centre, bringing together developers and hotel operators, and using its own land holdings to secure specific outcomes.

Other Concerns

The Core Strategy has been developed over a number of years, but the consultation is being done against a background of policy change being introduced by the Coalition government. BTP asks that B&NES takes full advantage of the opportunities presented by the localism agenda to shape development.

A good example of this is in relation to car parks. The BTP board also made a recommendation in relation to the parking as follows: New hotel development in the city should be required to make provision for parking. Failure to make this a requirement will put pressure on limited provision, reduce the quality of the visitor experience and increase the potential for tension between residents and visitors. BANES should facilitate this by working with developers to allocate designated parking spaces if a site, such as a boutique hotel, has no prospect of space on the development site.

On 3rd January 2011 the Coalition Government issued a press release outlining the intention to 'free up' local authorities in relation to car parking. An extract from the release says, Communities and Local Government Secretary Eric Pickles said:

"Whitehall's addiction to micromanagement has created a parking nightmare with stressed-out drivers running a gauntlet of unfair fines, soaring charges and a total lack of residential parking. The result is our pavements and verges crammed with cars on kerbs endangering drivers, cyclists and pedestrians, increased public resentment of over-zealous parking wardens and escalating charges and fines. "Today the Government is calling off Whitehall's war on the motorist by scrapping the national policy restricting residential parking spaces and instructing councils to push up charges. We expect councils to follow suit. From now on communities have the freedom to set competitive local charges that bring shoppers to the high street, proportionate enforcement and the right number of spaces for new development. We're getting out of the way and it's up to councils to set the right parking policy for

their area."

In summary, BTP is excited by the opportunities for increasing the economic contribution from tourism and we welcome the vision set out in the Core Strategy. In our view what is now needed is the same visionary thinking in relation to delivery. We look to B&NES to take ownership of the implementation and to take a lead in ensuring that the vision of high quality, long term, development is what actually happens. BTP is keen to play a part in this and will support B&NES in any way it can.

Yours sincerely

Robin Bischert
Chief Executive

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 306\3

Plan Reference: Paragraph 2.07

Representation • The Bath spatial strategy has been prepared with this regeneration agenda in mind so that it
(soundness): contributes to the realisation of a distinctive and authentic 21st century identity for the city. As an international cultural asset, well considered and high quality growth is a key principle guiding the overall level, type and design of new development. The strategy prioritises the creation of enduring developments, places and neighbourhoods over 'planning by numbers' in order to deliver relatively short term targets. It seeks to shape development that will be appreciated and used well into the future and deflect ill conceived proposals that might be rejected within a generation.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 307 **Respondent:** SWAN

RepresentationReference: 307\1

Plan Reference: Paragraph 1.05

Representation The document make reference to the 'Place Making Plan' but there are no further details of this plans
(soundness): status, how it will be developed, who will be involved in its production. The concept is championed by CABE who will be ceasing to exist. Under what framework and guidance will placemaking plans proceed in the future?

No reference is made to any of the existing Community Led Plans that have been produced within B&NES (currently 16) and how this existing body of work and community evidence will be incorporated.

**Change sought to
make sound:** Clarification of what a 'Placemaking Plan' is.

How existing plans and policies will feed into this The status and relevance of existing village design statements, parish plans, Community Led Plans, SPD and the Sustainable Community Strategy when

developing the Placemaking Plan

Representation (legal compliance): No reference is made to the new Neighbourhood Plans and how these will be incorporated into the Core Strategy

Change sought to make legally compliant: Consideration for Neighbourhood plans and their inclusion

RepresentationReference: 307\2

Plan Reference: Paragraph 5.43

Representation Reference is made to key transport infrastructure improvements serving rural areas this is not
(soundness): technically correct. The services run through rural areas but unless residents are within 5 minutes walk or ½ km of a bus stop on the service there will be little improvement to their experience of the transport infrastructure

Change sought to Acknowledge that public transport infrastructure in rural areas can be met in many different ways and
make sound: that the strategy will enable conditions for these schemes to be developed

This will then link in with the statement 6.98

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 307\3

Plan Reference: Paragraph 5.12

Representation Strategic issues for Rural areas should include Broadband access as a distinct element rather than being
(soundness): assumed to be within access to services and economic development.

Change sought to Inclusion of Broadband as a strategic issue
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 307\4

Plan Reference: Policy CP13: Infrastructure Provision

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:

Respondent Number: 308 **Respondent:** Andrew Guilor

RepresentationReference: 308\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation I understand that there is the possibility of a review for a proposed housing development on the above
(soundness): playing fields. As a local resident, parent of a pupil at the school and dog walker I want to state my strong objection to any prospective development on this lane for all the reasons when The Council reached their decision on 2007 to deny permission - nothing has changed.

Please provide reassurance that this land will not be released for development.

"Agrees to maintain the position agreed at Council on 12th October 2006 that the land at Beechen Cliff School lower field, bordering Greenway Lane, remain unallocated for development, and the existing recreational open space designation (Policy SR.1A) is retained, because the harm caused by development in this location to the World Heritage site, the Conservation area and local character is considered unacceptable"

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 309 Respondent: Rachael Hushon

Representation Reference: 309\1

Plan Reference: Policy B2: Central Area Strategic Policy

Representation I am concerned that diagram 8 page 42 appears to propose that the current central area be extended
(soundness): by 2026 to include the Recreation Ground and Johnstone Street as part of a city centre extension.

I am concerned that the correct legal and planning justification for this has not been complied with. Rezoning land to benefit B&NES corporate requires more probity and planning/legal justification than has been provided

This rezoning if allowed to happen could have far reaching implications on any future licensing and planning applications for an area which is currently residential only and green open space. The financial gain of rezoning brings into question the impartiality of B&NES in their motives for rushing this through

This rezoning pre-empts the public consultation on uses of the Rec, it ignores the existing covenants which deny commercial development. It also pre-empts the Charity Commission decision regarding the Trusts' uses of the Rec.

It also suggests that Johnstone street is an existing access to the Rec. This is not the case the street has existed as a cul de sac with no access to the Recreation Ground for 200 years

Change sought to make sound: Central Area zoning to remain as currently delineated.

Representation (legal compliance): BANES Council have sought to regard the Rec and certain residential streets within the PERA area as "commercial" in the latest version of its Core Strategy, thereby giving further credence to the development of commercial activities on the Rec, and in neighbouring residential areas.

As you know it is the 1956 conveyance that appears to govern how the Trust should be run. This conveyance refers to the Conveyance dated April 1922 which imposes on the parties to the 1956 conveyance an obligation "to observe and perform the covenants and conditions contained in the April 1922 conveyance"

The April 1922 conveyance contains a covenant binding on ANY future owner of these specific premises (the current Rec land) that "there will be no buildings for the purposes of trade or business which may be a nuisance, annoyance or disturbance or otherwise prejudicially affect the adjoining

premises or neighbourhood." This seems to be clear that whoever owns the land, and regardless of any land-swap, that these conditions should be upheld.

B&NES have not provided adequate justification for the rezoning of either the recreation ground a green space or Johnstone Street a residential street.

They have presented misleading documents at various consultation events regarding the status of Johnstone Street which is currently a residential cul de sac.

Change sought to make legally compliant: Compliance with existing covenants pursuant to the Recreation Ground.
Maintain current status of the Recreation Ground, and Johnstone Street as residential

Respondent Number: 310 Respondent: The Initiative

RepresentationReference: 310\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

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

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

1. We believe that economic development must come first and foremost in every strategy since it is the foundation from which all funding is generated which can thereafter meet the needs of the welfare of both people and heritage.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 310\2 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

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

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

2. We note the reduction in the proposed numbers of jobs and houses compared to previous estimates and despite them being unambitious, we consider them acceptable as an absolute minimum. Ideally, they will be surpassed, but on no account should we fall short of delivering them and there must be no allowance for resting on laurels once 60% or 70% is achieved.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 310\3 S

Plan Reference: Policy B1: Bath Spatial Strategy

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

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

3. We believe there is adequate land in Bath to produce the number of high value jobs that are so necessary. In fact there may be an argument for some employment land coming out of the market in order to create a demand which would allow developers the opportunity to create modern office space.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 310\4 S

Plan Reference: Policy CP8: Green Belt

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

However, there are 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:

RepresentationReference: 310\5 S

Plan Reference: Whole Document

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

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 310\6 S

Plan Reference: Whole Document

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

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

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

Yours sincerely,

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 311 **Respondent:** Parish Council's Airport Association

RepresentationReference: 311\1 S

Plan Reference: Strategic Objective 1: Cross cutting objective - Pursue a low carbon and sustainable future in a changing climate.

Representation 2. Carbon emissions associated with Bristol Airport

(soundness): We are pleased to see the Council's recognition of the importance of the challenge of climate change and its commitment to reduction expressed in many places. These include Objective 1, Cross cutting objective "Pursue a low carbon and sustainable future in a changing climate" (p. 15), the Key Strategic Issue with its reference to adopting "lower carbon lifestyles" and the "need to adopt environmentally friendly practices" and the commitment "to providing leadership for a reduction of the area's CO2 emissions by 45% by 2026 from 1990 levels" (6b Responding to a Changing Climate).

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 311\2

Plan Reference: Paragraph 1.07

Representation Near the beginning of the Draft Core Strategy is a passing comment that "Bristol International Airport is (soundness): one of the fastest growing regional airports in the UK" (p. 9 , 1.07). There is, however no mention at all in the Draft Core Strategy of the green house gas emissions which will be generated by such growth of the airport.

It might be said that historically the government has not included aviation greenhouse gas (ghg) emissions among national targets, and that Bristol airport is (just) outside the B&NES boundaries. However, in October 2008 it was confirmed that international aviation was to be included in ghg reduction targets [Statement by Secretary of State for Environment, Ed Miliband of 16 October 2008]. More recently still, the Government announced that it "will establish a new target to get aviation emissions in 2050 below 2005 levels" [15 Jan 2009, Commons Hansard, vol. 486, Column 355-360].

A logical development would be for aviation ghg emissions to be "counted" among those of local authorities near to airports. Even without this development, it would be expedient for Bath & NES to keep a watching brief on the increase in the airport's emissions. The Draft Core Strategy recognises the serious consequences of unabated ghg emission, irrespective of whether the source is within, or just outside its boundaries. This is consistent with the Council's policies regarding the airport's expansion, as expressed in motions of 12th October 2006 and 14th May 2009 and the recommendation of the Development Control Committee on 9th September 2009.

Change sought to 4. Conclusions.

make sound: Bristol airport lies a mile or two outside the Bath & N.E. Somerset boundary, but has a large effect on what happens in the district. We recommend some explicit recognition of this should be included in the Core Strategy, including consideration of the likely impact on transportation and road infrastructure should the planned expansion be realised.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 311\3

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation 3. Airport expansion and the economic development of Bath & N. E. Somerset.

(soundness): The Draft Core Strategy is much concerned with questions of economic development, especially the building of new houses, and the provision of new jobs. It recognised that at present there is a shortage of jobs, especially in the southern part of the district (the so-called "Somer Valley") (p. 19, para. 1.29) meaning that long commuter journeys by private car occur, contrary to the Council's policies for reduction of greenhouse gas emissions (p. 129 sect. 6.93) As the Draft Core Strategy aspires to see around 11,000 new dwellings built, but only 8,700 new jobs provided (p. 19 sect. 1.26; p. 20 sect. 2), there is clearly potential for the problem of shortage of jobs to be aggravated. This applies particularly in the Somer Valley area where 2,700 new dwellings are to be built, but only 1000 new jobs provided (p. 81-2).

The development of tourism is seen as a potent means of providing new jobs, both in Bath itself and in the southern parts of the district (p. 15, 16, p. 78 Strategic issues sect. 4.08, pp. 100, 109, 114).

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 311\4

Plan Reference: Paragraph 6.86

Representation (soundness): Effect of airport expansion. The proposed expansion of Bristol airport will impact on these aspects of 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:

RepresentationReference: 311\5

Plan Reference: Paragraph 6.93

Representation (soundness): The PCAA also believe that the Draft Core Strategy must also consider and take into account the impact 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:

RepresentationReference: 311\6

Plan Reference: Chapter 7: Monitoring

Representation The Draft Core Strategy lists ways in which its objectives will be monitored. For reasons given above we
(soundness): suggest two additional criteria should be included among the "Monitoring of Strategic Objectives", and monitored on an annual basis. These are (i) the green house emissions associated with Bristol airport and its flights, and (ii) the level of "tourist deficit", i.e. the numbers of outward-bound and inward bound tourists.

Note. The various figures and objective statements made in this submission are based on sound evidence, taken from reputable and easily verifiable sources – full detail can be provided if required.

PCAA
January 2011

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 312 **Respondent:** Doris Bechstein

RepresentationReference: 312\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation As a local Entry Hill resident and parent of a Beechen Cliff student I am dismayed at the prospect of the
(soundness): Beechen Cliff School playing fields being sold off for development. The fields are used extensively for recreation, exercise and accessing the school. Losing them would not only take away vital amenities but also increase the already unbearable levels of traffic in the area. With student numbers at BC likely to go up as a result of the Culverhay school closure this land is more need than ever!

Here are some further points for my objection:

- Housing land targets have been reduced since 2007: there is even less of a case for developing the Lower Field now than then.
- The assessment in the SHLAA is too cursory: it ignores the powerful arguments against the proposal set out by the Council in its decisions in 2007, nor sought views from the local community: the effect is one of bias, which urgently demands revision.
- Government policy on playing fields is now tighter than when disposal consent was given.
- The school has a real need for the playing fields: since 2003 pupil numbers have risen, the daily use of the land by the school's pupils has intensified, and the current headmaster's view is that the land is needed as playing fields.
- The SHLAA ignores the impact on the setting of the listed Devonshire Buildings.
- The SHLAA ignores Policy BH.15 (saved from the Local Plan) on visually important open space.
- The SHLAA ignores the land's role as a green wedge and wildlife corridor.
- The SHLAA ignores the current extensive permissive use of the land for informal recreation by local residents
- The SHLAA has given insufficient attention to the traffic issues: it assumes they can be simply solved,

and this is far from clear.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 313 Respondent: Richard Andrews

Representation Reference: 313\1

Plan Reference: Policy CP13: Infrastructure Provision

Representation (soundness): 3. Key Strategic Issue (1.12), 'Growth', and the transport infrastructure.

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 residentI 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:

Respondent Number: 314 Respondent: Helen Woodley

Representation Reference: 314\1

Plan Reference: Policy CP5: Flood Risk Management

Representation (soundness): I think the Draft Core Strategy is not sound because not effective in tackling the effects of climate 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 make sound: 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:

Representation Reference: 314\2

Plan Reference: Policy CP11: Gypsies, Travellers and Travelling Showpeople

Representation (soundness): The policy as drafted is almost designed NOT to deliver and is thus ineffective and unsound. An 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:

RepresentationReference: 314\3

Plan Reference: Glossary

Representation In one respect this is not consistent with national policy

(soundness): Brownfield land definition needs updating, as it still covers the curtilage of the development, which included gardens. It also refers to PPG3 which is now PPS3.

The change is needed to accord with the statement by The Minister of State, Department for Communities and Local Government (Greg Clark):

“I am today re-issuing planning policy statement 3: Housing (PPS3) with the following changes: the definition of previously developed land in annex B now excludes private residential gardens ...”
(Hansard Wednesday 9 June 2010)

Change sought to The update should accord with the current wording of PPS3. In addition, PPS3 should be added to the

make sound: National Policy documents for DWI.12 Green Infrastructure 2011-2026 (P24) since PPS3 covers the protective legislation for allotments.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 314\4

Plan Reference: Policy CP7: Green Infrastructure

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:

RepresentationReference: 314\5

Plan Reference: Policy CP5: Flood Risk Management

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:

Respondent Number: 315 Respondent: Charlcombe Parish Council

RepresentationReference: 315\1

Plan Reference: Appendix 2: Saved Local Plan Policies

Representation It is reassuring to note that most of the key policies of the current Local Plan have been retained.
(soundness): However there are two very important exceptions.

Policies NE.1 and NE.2 do not appear to be reflected in the Draft Core Strategy. As a rural parish situated entirely within the Cotswold AONB, Charlcombe Parish Council considers these two policies to be key to preserving the landscape character of the local countryside and conserving the natural beauty of AONBs. Indeed, failure to comply with Policy NE.2 has been cited by the Local Planning Authority in refusing a number of recent applications in Charlcombe Parish. Bath's surrounding countryside plays a key role in providing the setting for the world heritage city and it is essential that adequate measures remain in place to protect it against inappropriate development.

Change sought to We would request that Appendix 2 of the Draft Core Strategy is amended to retain Policies NE.1 and
make sound: NE.2 of the Local Plan.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 315\2

Plan Reference: Policy CP3: Renewable Energy

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:

Respondent Number: 316 Respondent: Broadmead Lane Properties

Representation Reference: 316\1

Plan Reference: Policy KE1: Keynsham Spatial Strategy

Representation (soundness): Broadmead Lane Properties has significant interests at Broadmead in Keynsham. They own most of the land and buildings of Broadmead Industrial Estate as well as Broadmead Lane, which provides access and egress to the Keynsham sewerage treatment plant (Wessex Water), landfill site (B&NES) and all businesses and marine interests of Broadmead Industrial Estate. There are approximately 100 people who work for a number of small to medium size enterprises (SMEs) at Broadmead Industrial Estate. This area is within the flood plain and has witnessed a number of flood events in recent history.

Although we support the overall intentions of B&NES Core Strategy Development Plan Document (DPD), we feel that there has been insufficient thought and recognition given to the role that Broadmead Lane Properties will play in flood defence of Broadmead Lane and Broadmead Industrial Estate. This is needed to secure the businesses and jobs on site and encourage investment in refurbishing the existing buildings and structures so that they are flood resilient to residual flood risk from raised defences. This would complement the flood risk management infrastructure being proposed upstream and downstream of Broadmead, ensuring it is compliant with Planning Policy Statement 25 (Development and Flood Risk) and to secure continued growth of business and jobs on site. Unfortunately, Broadmead Lane is not recognised as a 'desirable infrastructure item' in Section 3.21 on page 72 of the Core Strategy.

As a significant landowner upstream of Bristol, Somerdale and Keynsham, we feel that the Strategic Vision for Keynsham in the Core Strategy does not wholly consider the economic and resource use potential of Broadmead Industrial Estate and Broadmead Lane. Similarly, the Core Strategy does not recognise the strategic role that Broadmead Lane should play in ensuring the flood plain continues to function, but in a way that supports the continued growth of facilities and businesses at Broadmead Industrial Estate. The redevelopment of Broadmead Lane to compensate climate change flood risk will need to be aligned with the raised defences needed for Keynsham sewerage treatment plant and B&NES landfill, which is being proposed as a Materials Recovery Facility (MRF) pers comm. This will need a strategic solution between the interested parties, which should be identified in the Core Strategy rather than only including the Keynsham sewerage treatment plant and proposed MRF (see section 3.10 of the Core Strategy).

In addition to the above, we feel that insufficient consideration or annotation has been allowed in the Core Strategy to recognise the flood risk to Broadmead Lane and Broadmead Industrial Estate. Flood Risk Management has not been sufficiently Justified by IDP Reference K1.2 of Table 6 on page 73 of the Core Strategy, 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 Level 2 Strategic Flood Risk Assessment (SFRA) for Keynsham also suggests that without suitable flood risk management infrastructure, the flood plain at Broadmead will become more intense in depth, velocity and area in the future due to climate change.

The aforementioned is further supported by the suite of Level 2 SFRA maps and the options ranking table in the Outline Appraisal for Keynsham (Flood Risk Management Strategy 2009). The options ranking table prioritise various options for flood risk management, including 'Build new raised defences or land raising with flood resilience design to protect potential new development sites adjacent to the River Chew and River Avon', 'Building regulations (resilience)' and 'Relocation of properties'. We would like to see Broadmead Lane and Broadmead Industrial Estate identified in more detail on Diagram 12

on page 65 and referred to in Table 6 on page 73 so that they are included in future redevelopment plans and considered for relevant flood risk management infrastructure.

Finally, the Vision for Keynsham in the Core Strategy does not Justify the need for flood risk management infrastructure outlined above, which is clearly omitted from the map in Diagram 12 on page 65. Similarly, it does not Justify the potential role our land and infrastructure could play to provide medium- to high-value skills, jobs and industry which is much needed in and around Keynsham. Broadmead Industrial Estate has significant opportunity to increase capacity of jobs and businesses in the future as a result of mitigating climate change flood risk, which could further help Keynsham capitalise on this valuable resource. By including Broadmead Lane and Broadmead Industrial Estate into Diagram 12 rather than ignoring their potential, B&NES would provide for a more Effective and Sound infrastructure delivery plan. We want to ensure this is given due consideration in the Core Strategy.

By embracing Broadmead Lane and Broadmead Industrial Estate 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 Broadmead Industrial Estate and ensure that the historical buildings are sufficiently defended to conserve their importance.

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 Broadmead Lane and Broadmead Industrial Estate to Keynsham.
2. Section 3.18e on page 68 should read "The proximity of the railway station to the High Street, Somerdale and River Avon."
3. Section 3.21 on page 72 should add Broadmead Lane to the list of 'desirable infrastructure items'.
4. Given the importance of Broadmead Lane to provide vehicle access to the Keynsham sewerage treatment plant, proposed MRF (B&NES landfill) and Broadmead Industrial Estate, it is recommended that an additional item is added to Table 6 on page 73 to include "Flood protection measures for Broadmead lane and Broadmead Industrial Estate." This will complement Item K1.3 Major Improvements to Sewerage capacity on page 64 of B&NES Infrastructure Delivery Programme (2010).
5. It could be argued that a holistic approach to infrastructure development and flood risk management infrastructure for Broadmead Lane and Broadmead Industrial Estate would demonstrate the delivery of 'Opportunities for integrated infrastructure provision' as suggested in Section 6.1 on page 79 of B&NES Infrastructure Delivery Programme (2010) which states "Greater coordination between highways and various infrastructure provision and maintenance to minimise disruption and reduce costs."
6. Page 2 of the Keynsham Summary Draft Core Strategy leaflet statement "No changes to the Green Belt" should be further explained in the Core Strategy to explain that some Green Belt development would be required e.g. Broadmead, as identified in the options ranking table of the Outline Appraisal for Keynsham (Flood Risk Management Strategy 2009) that included 'Rural land use change upstream of Keynsham'.
7. The Diagram on page 4 of the Keynsham Summary Draft Core Strategy leaflet should have identified Broadmead Industrial Estate as a place for business growth.
8. Page 5 of the Keynsham Summary Draft Core Strategy leaflet 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." This will ensure consistency between documents.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 318 Respondent: MOD

RepresentationReference: 318\1

Plan Reference: Strategic Objective 2: Protect and enhance the District's natural, built and cultural assets and provide green infrastructure.

Representation The Ministry of Defence (MOD) fully supports the overall objective of securing optimum use of
(soundness): previously developed sites to meet the housing and other development needs of the area in order to maintain the integrity and purpose of the Green Belt and other greenfield locations, the World Heritage Site, support urban regeneration and encourage the use of means of transport other than the motor car.

MOD takes the view that its portfolio of sites in Bath, once vacated, will represent viable options for future productive development.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 318\2

Plan Reference: Policy B1: Bath Spatial Strategy

Representation MOD generally supports the references to its landholdings in Bath (Foxhill, Warminster Road and
(soundness): Ensleigh).

Since these sites are currently in one public ownership, there exists the opportunity to develop a composite arrangement of land use allocations across all 3 sites, to ensure maximum social and economic benefits are derived from the whole landholding, rather than a fragmented approach to each site as and when redevelopment takes place. This approach will enable particularly, appropriate levels of employment uses, public open space, and affordable housing are provided in the most suitable locations across the city.

MOD would therefore counsel the removal of the target provision for housing, recommending that this is undertaken in the Placemaking Plan when more detailed evaluations of the sites to include ground conditions, landscape, ecological, heritage, traffic, utilities, and visual assessments, can provide a more persuasive and realistic foundation for future development options, including the density of housing development.

Regardless of the above, paragraph 2.22 identifies Foxhill and Warminster Road as being suitable to accommodate "about 850 homes" but the figures derived from the evaluations conducted for the SHLAA, suggest these 2 sites could accommodate at least 890, even if the suggested density factors are accepted.

As a secondary issue, 850 from an overall target of 2500 leaves a challenging target of around 1650 units to be provided by infill, which may be both optimistic and impracticable.

There also remain prospects of Ensleigh being vacated within the plan period, albeit maybe only partially, which would give further opportunities for additional housing units to be provided on MOD land.

Change sought to make sound: Delete from Chapter 2d, paragraph 2.22 (page 48), in its entirety, the sentence beginning "The Strategic Housing Land Availability Assessment suggests..."

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 318\3

Plan Reference: Paragraph 1.18

Representation In view of the current uncertainty surrounding the status of Regional Spatial Strategies (RSS), it would **(soundness):** be appropriate to recognise the draft RSS's published expectations for housing provision in the district together with an identification of the sources of new evidence which have been updated since this current impasse was reached.

Change sought to make sound: Make reference to the most recent housing provision requirements as established in the draft Regional Spatial Strategy for the South West and justify the target figures provided in the Draft Core Strategy by making reference to the evidence which supports this changed position.

Representation (legal compliance): The proposals to abolish RSS are currently subject to review and it would therefore be appropriate to recognise this in the commentary.

Change sought to make legally compliant:

RepresentationReference: 318\4

Plan Reference: Chapter 1: Vision and District-wide Strategy

Representation The commentary contained in paragraph 1.34 identifies an affordable housing requirement of "around **(soundness):** 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:

RepresentationReference: 318\5

Plan Reference: Policy CP9: Affordable Housing

Representation The commentary contained in paragraph 1.34 identifies an affordable housing requirement of "around **(soundness):** 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:

RepresentationReference: 318\6

Plan Reference: Table 2: Key District-wide Infrastructure

Representation It is plain that the successful delivery of this strategy will be dependent, amongst other things, on the **(soundness):** provision of the appropriate levels of infrastructure, but the table presents many unquantified items and very little by way of commitments which will make it almost impossible to manage.

There is little by way of convincing evidence that the risks associated with these items will be effectively managed.

Change sought to make sound: A thorough and realistic reassessment of the requirements for infrastructure to support the levels of growth envisaged by this strategy, together with a commitment to its delivery via the mechanisms available.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 319 Respondent: Raymond Baron Hervey

RepresentationReference: 319\1

Plan Reference: Chapter 1: Vision and District-wide Strategy

Representation Policy DW1 and SV1(3) as currently proposed are inconsistent with the 'flexibility' that is consistently **(soundness):** emphasised by PPS12 as a requirement of Core Strategies. It states for instance: 'A strategy is unlikely to be effective if it cannot deal with changing circumstances.' (PPS12, paragraph 4.46).

PPS12 stresses that because Core Strategies are long-term documents, many issues can change over that time and therefore plans 'should be able to show how they handle contingencies', through showing 'what alternative strategies have been prepared to handle this uncertainty and what would trigger their use' (op. cit). Whereas the Economic Strategy adopts a fairly flexible approach, it is not apparent that this has been translated into policies DW1 and SV1(3) given their failure to provide for a sufficient quantity of employment land and jobs. Similarly PPS4, Policy EC2, criterion b states that Development Plans should:

'[support] existing business sectors, taking account of whether they are expanding or contracting and, where possible, identifies and plans for new or emerging sectors likely to locate in their area, such as those producing low carbon goods or services. However, policies should be flexible enough to accommodate sectors not anticipated in the plan and allow a quick response to changes in economic circumstances' The under-provision of employment land in the proposed Core Strategy, beyond being inherently problematic as identified above, fails to provide the flexibility demanded by PPS4 above.

Areas of support

Notwithstanding the above objections to the proposed levels of employment growth, we are supportive of the identification of the Westfield Industrial Estate as a location for further floorspace. We would suggest that amongst the existing major employment sites in the Somer Valley, Westfield would be the most suitable to accommodate significant further floorspace. The Business Growth and Employment Land Study (Roger Tym / Cluttons, 2009, produced for BANES) highlights a number of advantages of Westfield, including in locational terms, and reports high satisfaction levels amongst occupiers.

However, it also reports that there are few vacant units. We would therefore suggest that further development at Westfield would require a significant eastward expansion of the existing area onto the relatively unconstrained adjacent land. In particular, the level area of land beyond 1st Avenue and 3rd Avenue could form a logical and unobtrusive, but nonetheless sizeable, strategic employment allocation of approximately 6 hectares.

Change sought to make sound: Amend policies DW1 and SV1(3) to reflect the quantity of employment land and jobs that is identified by the BANES Economic Strategy as a requirement of the plan area to 2026.

Representation (legal compliance): The Economic Strategy for Bath and North East Somerset document (published 2010) is one of the most recent elements of Bath and North East Somerset's (BANES') evidence base on which the Core Strategy is purportedly based, and takes into account economic changes in the area since the recent recession. However, some of its key recommendations have not been reflected in the proposed Core Strategy. The table below provides a summary of the differences between the two:

(see table in supporting material)

In brief, the Core Strategy proposes 50,500 sq.m less new employment space than is recommended by the Economic Strategy for the Somer Valley, and only 40% of the jobs provision. At a BANES-wide level only 58% of the total provision for jobs is made. Further, whereas the Economic Strategy recommends significant new industrial space, the Core Strategy envisages an overall decline.

It is thus clear that the Core Strategy deviates significantly from BANES' own, current, economic objectives that have been developed in partnership with the 'Sustainable Growth Alliance (SGA)' - the economic working group of the Local Strategic Partnership for Bath and North East Somerset. This body includes a range of organisations including the Government Office for the South West, the universities in Bath, and the Federation of Small Businesses. We would draw attention to the important connection between the Economic Strategy and the Sustainable Community Strategy ('SCS') for BANES - namely that the former is explicitly identified by the latter as a means of delivering its vision.

Hence, the failure of the Core Strategy to make provision for adequate employment land places it in conflict with the SCS, which is inconsistent with the approach required by PPS12 (paras 4.34-4.35). Policies DW1 and SV1(3) as they stand are thus unsound and not legally compliant.

Change sought to make legally compliant: Amend policies DW1 and SV1(3) to reflect the quantity of employment land and jobs that is identified by the BANES Economic Strategy as a requirement of the plan area to 2026.

Representation Reference: 319\2

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation (soundness): Policy DW1 and SV1(3) as currently proposed are inconsistent with the 'flexibility' that is consistently emphasised by PPS12 as a requirement of Core Strategies. It states for instance: 'A strategy is unlikely to be effective if it cannot deal with changing circumstances.' (PPS12, paragraph 4.46).

PPS12 stresses that because Core Strategies are long-term documents, many issues can change over that time and therefore plans 'should be able to show how they handle contingencies', through showing 'what alternative strategies have been prepared to handle this uncertainty and what would trigger their use' (op. cit). Whereas the Economic Strategy adopts a fairly flexible approach, it is not apparent that this has been translated into policies DW1 and SV1(3) given their failure to provide for a sufficient quantity of employment land and jobs. Similarly PPS4, Policy EC2, criterion b states that Development Plans should: '[support] existing business sectors, taking account of whether they are expanding or contracting and, where possible, identifies and plans for new or emerging sectors likely to locate in their area, such as those producing low carbon goods or services. However, policies should be flexible enough to accommodate sectors not anticipated in the plan and allow a quick response to changes in economic circumstances' The under-provision of employment land in the proposed Core Strategy, beyond being inherently problematic as identified above, fails to provide the flexibility demanded by PPS4 above.

Areas of support Notwithstanding the above objections to the proposed levels of employment growth, we are supportive of the identification of the Westfield Industrial Estate as a location for further floorspace. We would suggest that amongst the existing major employment sites in the Somer Valley, Westfield would be the most suitable to accommodate significant further floorspace. The Business Growth and Employment Land Study (Roger Tym / Cluttons, 2009, produced for BANES) highlights a number of advantages of Westfield, including in locational terms, and reports high satisfaction levels amongst occupiers.

However, it also reports that there are few vacant units. We would therefore suggest that further development at Westfield would require a significant eastward expansion of the existing area onto the relatively unconstrained adjacent land. In particular, the level area of land beyond 1st Avenue and 3rd Avenue could form a logical and unobtrusive, but nonetheless sizeable, strategic employment allocation of approximately 6 hectares.

Change sought to make sound: Amend policies DW1 and SV1(3) to reflect the quantity of employment land and jobs that is identified by the BANES Economic Strategy as a requirement of the plan area to 2026.

Representation (legal compliance): The Economic Strategy for Bath and North East Somerset document (published 2010) is one of the most recent elements of Bath and North East Somerset's (BANES') evidence base on which the Core Strategy is purportedly based, and takes into account economic changes in the area since the recent recession. However, some of its key recommendations have not been reflected in the proposed Core Strategy. The table below provides a summary of the differences between the two:

(see table in supporting material)

In brief, the Core Strategy proposes 50,500 sq.m less new employment space than is recommended by the Economic Strategy for the Somer Valley, and only 40% of the jobs provision. At a BANES-wide

level only 58% of the total provision for jobs is made. Further, whereas the Economic Strategy recommends significant new industrial space, the Core Strategy envisages an overall decline. It is thus clear that the Core Strategy deviates significantly from BANES' own, current, economic objectives that have been developed in partnership with the 'Sustainable Growth Alliance (SGA)' - the economic working group of the Local Strategic Partnership for Bath and North East Somerset. This body includes a range of organisations including the Government Office for the South West, the universities in Bath, and the Federation of Small Businesses. We would draw attention to the important connection between the Economic Strategy and the Sustainable Community Strategy ('SCS') for BANES - namely that the former is explicitly identified by the latter as a means of delivering its vision.

Hence, the failure of the Core Strategy to make provision for adequate employment land places it in conflict with the SCS, which is inconsistent with the approach required by PPS12 (paras 4.34-4.35). Policies DW1 and SV1(3) as they stand are thus unsound and not legally compliant.

Change sought to make legally compliant: Amend policies DW1 and SV1(3) to reflect the quantity of employment land and jobs that is identified by the BANES Economic Strategy as a requirement of the plan area to 2026.

Respondent Number: 320 Respondent: Andrew Jolliffe

Representation Reference: 320\1

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation (soundness): It is recognised that the current Examination is concerned with the Core Strategy and not site-specific considerations. However for the avoidance of doubt, this submission is made on behalf of the Kilmersdon Estate, which has extensive land holdings around the southern fringes of Midsomer Norton, Radstock and Writhlington, areas of which would be suitable for residential development.

Summary of case There is a case for brownfield redevelopment in Norton Radstock under the broad banner of regeneration. However, this does not justify the approach set out under SV1(4)(b), which effectively imposes a 15-year blanket restraint against any new greenfield housing land allocations around the periphery of the town. By adopting this approach, Bath and North East Somerset Council (BANES):

- (a) Fails to build the flexibility into its Core Strategy that is required by PPS12, placing an excessive reliance upon the development of brownfield sites whose achievability is uncertain and whose suitability has not been tested;
- (b) Pre-empted and prejudices the Site Allocations DPD, and thus fails to provide the opportunity for reasonable alternatives to be fully scrutinised through the site allocation process.

These two key points are now expanded upon.

A. Flexibility and uncertainty

Policy SV1 as currently proposed is inconsistent with the 'flexibility' that consistently emphasised by PPS12 as a requirement of Core Strategies. It states for instance: 'A strategy is unlikely to be effective if it cannot deal with changing circumstances.' (PPS12, paragraph 4.46).

PPS12 stresses that because Core Strategies are long-term documents, many issues can change over that time and therefore plans 'should be able to show how they handle contingencies', through showing 'what alternative strategies have been prepared to handle this uncertainty and what would trigger their use' (op. cit). The current proposal to accommodate all new development within the existing Housing Development Boundary (HDB) is self-evidently an inflexible approach, and does not appear to be accompanied by consideration of contingencies.

Two important, unfounded, assumptions underlie BANES' approach: firstly, that the full complement of 2,700 dwellings can be accommodated within the existing boundary; and secondly that all such development would, in all instances, be more suitable than greenfield alternatives. In terms of the first assumption, although BANES has identified through its Strategic Housing Land Availability Assessment ('SHLAA', December 2010) that there may be sufficient supply within the existing HDB to meet identified Core Strategy targets, this is essentially a mathematical conclusion and it has not been demonstrated that all these sites are deliverable. In terms of the second assumption, BANES has fallen into a circular argument in terms of the supply of potential sites and Core Strategy policy. On the one hand, the Core Strategy is purportedly based upon and guided by evidence such as the SHLAA.

However, the SHLAA itself discards sites as 'not suitable' purely on the basis of draft Core Strategy policy SV1(4a) – one example being site RAD24 (Knobsbury Lane and Frome Road, Writhlington).

Thus, nowhere is it actually shown that all greenfield sites are inherently unsuitable, and the policy is consequently not justified. In summary, the Core Strategy's objectives for the Somer Valley (particularly in terms meeting housing demand) are at significant risk given the inflexible approach that policy SV1 adopts. The approach BANES proposes in this regard is thus unsound since it is inconsistent with PPS12.

b. Pre-emption of Site Allocations DPD Policy SV1(4) goes beyond the remit of Core Strategies defined by PPS12. The foremost role of a Core Strategy is to provide: 'an overall vision which sets out how the area and the places within it should develop' (PPS12, para 4.1, criterion 1).

Within the context of BANES it is thus legitimate for the Core Strategy to, for instance, set out the broad hierarchy of settlements within the authority area and to identify broadly the quantity of growth that each of these should accommodate. However in determining that no greenfield sites are required in the Somer Valley, policy SV1(4) strays beyond strategic, spatial issues and by default into a comparative assessment of alternative sites within and around the town. Moreover, in defining the total quantity of new development required in the Somer Valley, but without offering the scope for the existing Housing Development Boundaries to be reviewed, policy SV1(4) is tantamount to allocating those SHLAA sites considered by officers to be suitable on the basis of their preliminary review. This is inconsistent with the requirement under legislation and national policy for there to be full consideration and consultation on development options.

Beyond these in-principle objections, we would draw the Inspector's attention to the following more practical points that underscore the need for a full review of development options:

- Evidence regarding HDBs. We understand that the existing HDBs in BANES were defined at around the late 1990s, and they remain largely unchanged since the Local Plan Deposit Draft 2002. To our knowledge there is no available evidence to support the location of these boundaries, and to our knowledge none has been presented to this Examination. Nonetheless, the SHLAA effectively categorises all sites outside of the HDBs as inherently unsustainable, with (for example) officers commenting as follows on site RAD24:

'These sites lie outside of the Radstock development boundary, and an in-principle objection will be raised on sustainability grounds ...'

It should be noted that HDBs often take tortuous routes, often excluding some central areas and excluding more peripheral areas, and this alone suggests that the above blanket approach to defining sustainability is unjustified. In summary, we believe that the reliance on these boundaries for the period to 2026 is unsound, because it is not evidence-based as required by PPS12. Instead a full review should be carried out in the context of a Site Allocations DPD, provision for which should be made in a revised wording to policy SV1.

Suitability of alternatives. Whereas the SHLAA purports to identify sufficient sites to cater for identified growth requirements in the Somer Valley, the preliminary assessments of candidate sites by no means conclusively demonstrate that these sites are deliverable. For instance, site MSN10 (Alcan) has been identified by the SHLAA as having the potential to deliver 150 units, but the planning officers' assessment sheet makes clear that there has been no detailed consideration of factors such as utilities, whether or not retention of employment space in this area would be beneficial, whether the local road network is suitable, and site-based issues such as contamination. Similarly, Site MSN6 (The Hollies / Sainsbury's) has been identified by the SHLAA as being suitable for further 80 dwellings but it is clear from officers' commentary that the achievability of the site will depend upon a number of extraneous factors, not least the need for it to be 'unlocked' alongside a further site (MSN.4a – South Road Car Park). These examples suggest that there is not currently enough evidence to show that these (and potentially other sites) are deliverable. Consequently it would be inappropriate for the Core Strategy to proceed relying upon these sites.

· Potential benefits of larger greenfield allocations. Although the countryside surrounding the Somer Valley settlements is constrained, it has by no means been shown that there are no suitable candidate sites, and this is a process that PPS12 envisages should be handled not by Core Strategies but by subsequent Development Plan Documents (where sites are not of a 'strategic' scale, i.e. 'central to the achievement of the strategy' – paragraph 4.6). Our client's land directly opposite Writhlington School (Site RAD.24) would for instance offer a medium-scale development opportunity close to a range of community facilities and public transport links, without significantly extending the overall envelope of Norton Radstock and without causing harm to the town's Conservation Area or any ecological designations. Development on this site could more readily be delivered than brownfield alternatives (there being no dependency on it being vacant), and community facilities and other infrastructure could be more effectively planned from the outset than on many of the smaller-scale infill alternatives included within the SHLAA. We recognise it is not the function of the Core Strategy to judge the merits of this or any other site, however we would suggest that full consideration has yet to be given to possible site allocations in the Somer Valley, and that this should occur in full at the Site Allocations DPD stage rather than be predetermined through a needlessly prescriptive Core Strategy policy.

Change sought to make sound: Delete from Policy SV1(4)(b) the reference to Housing Development Boundaries, thus enabling the Site Allocations DPD to consider suitable greenfield sites around the towns of Somer Valley. A possible new wording of Policy SV1(4)(b) would be as follows:

Ensure that any new housing above the existing commitments of 2,200 dwellings contributes to sustainable development within the Housing Development Boundary and has either employment benefit or contributes to the implementation of the Town Park.

Provision should be made elsewhere in the Core Strategy for a review of Housing Development Boundaries and the comparative assessment of greenfield and brownfield sites in the context of a site allocations DPD.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 321 Respondent: Northern Racing

Representation Reference: 321\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation Northern Racing consider that the Core Strategy is unsound as it is not consistent with national policy
(soundness): in that; it does not support sustainable tourism and leisure development in rural areas as required by PPS4; nor, is it flexible enough to allow for hotel development in the countryside in support of outdoor recreation at Bath Racecourse as required by the Good Practice Guide on Planning for Tourism; nor does it support the provision of this sport and recreation facility as required by PPG17.

Bath Racecourse is entering its 200th year anniversary. It is a fundamental part of the city's cultural and sporting heritage, in a city that is one of the oldest, if not the oldest, established leisure destinations in the UK. However, this longstanding association with the city cannot insulate the racecourse from structural and cultural changes in the horse racing industry where income from betting is in decline and all UK racecourses have to adapt to attract other sources of leisure spending to survive. Around the country, competing racecourses are adapting their facilities to enable them to provide a higher quality experience to racegoers, to provide other sports and leisure facilities outside racedays, and to provide better corporate hospitality facilities for local and visiting businesses.

Bath Racecourse is integral to the sporting and leisure offer of Bath and the surrounding area, its attraction as a major tourist destination, and, its attraction as a location to do business. Its redevelopment and improvement to adapt to market trends and survive as a viable business itself is therefore a strategic issue of paramount importance to the local economy. Unfortunately, the Core Strategy does not recognise this strategic role and makes no reference to the racecourse whatsoever. This does not accord with national policy. It is therefore unsound.

National Policy EC7 of PPS4 states that local planning authorities (LPAs) should support sustainable tourism and leisure developments that benefit rural communities and visitors and which utilise and enrich, rather than harm, the character of the countryside. LPAs should, through their LDFs, support the provision and expansion of tourist and visitor facilities in appropriate locations, and wherever possible, locate tourist and visitor facilities in existing or replacement buildings. The incorporation of additional tourist accommodation and leisure facilities through the replacement of existing grandstands and other buildings at Bath Racecourse would conform to this national policy to support business in rural areas.

Paragraph 1.2 of the Good Practice Guide on Planning for Tourism states that LPA's should have regard to the Guide in preparing local development documents. Annex A deals with tourist accommodation and states that LPAs should engage constructively with the tourist industry to identify suitable locations in plans for hotel accommodation to meet current and future needs, particularly, for those with business, conference and banqueting facilities, where the preference is to identify town centre sites. However, it goes on to state that in allocating sites in plans, LPAs need to recognise the nature of the particular market being met by the accommodation will influence the location chosen. The Guide cites the example of accommodation for those seeking to enjoy the natural environment through walking and outdoor recreation that may be better located in a rural area than in a major town centre some distance away from the attractions it serves. Hotel accommodation and facilities to serve visitors seeking to enjoy the outdoor recreations of horse racing and golf, and/or simply the countryside environment, aligns with this guidance.

Paragraph 25 of PPG17 states that in the countryside around towns LPAs should encourage the creation of sports and recreation facilities and ensure that they are accessible by alternative modes of transport to the car. Bath Racecourse has good accessibility being in close proximity to Landsdown Park & Ride, with the potential to add further Park & Ride and Coach Parking facilities supported by a bus shuttle service to the city centre. Paragraph 26 states that in rural areas these sports and recreational activities which are likely to attract significant numbers of participants or spectators should be located in, or on the edge of country towns. Clearly, the planners of 200 years ago also thought this a good idea, as Bath Racecourse is located close to the northern edge of Bath, a short coach drive from the city

centre.

The provision of new or replacement grandstand facilities incorporating a hotel and improve visitor facilities in support of the outdoor recreational uses of horse racing and golf would accord with national Green Belt policy in PPG2. It would also accord with national policy in PPS7 and PPG17 which do not preclude acceptable tourism and leisure development within the AONB provided it does no harm to the purposes of that designation. Provided sustainable means of transport can be provided to the racecourse through a bus service to and from the city centre, potentially in relation to an expanded Park & Ride service for the city centre, then any such development will accord with national transport policy in PPG13.

Part of the LDF Evidence Base includes the Council's Destination Management Plan (DMP). This makes it clear that tourism plays an important role in terms of the Bath economy, generating employment, underpinning other economic sectors and supporting a more varied range of facilities than the local population could afford alone. However, it cites a number of weaknesses which may threaten the city's future viability as a visitor destination. These include:-

- Tourism is static and may be contracting
- It is over dependent on holiday tourism
- A lack of accommodation capacity constrains and inhibits growth
- It is expensive and losing ground in terms of value for money
- Planning constraints mean the product is difficult to change and refresh

In consideration of these and other factors the DMP therefore takes as it's aim:-

'To develop a viable and sustainable visitor economy which continues to make an important contributions to the economic vitality of Bath and the surrounding area, enhances its image and standing, is in harmony with its unique environment, and adds to the quality of life for its residents'.

I underline the words 'and the surrounding area' as it is important note that the DMP does not restrict the development of a viable and sustainable visitor economy strictly to within the central area of the city of Bath alone, but rather it recognises that existing contribution and further opportunities of the area surrounding Bath, that includes the Racecourse, to contribute to the development necessary to address the weaknesses identified in the report.

Indeed, the vision 'Where we want to be' goes on to state that it is envisaged that the city will become a place with 'access to beautiful countryside', while listed as a 'Key principle' is the initiative to 'Link Bath to its hinterland to add depth'. Clearly, encouraging improved sporting, leisure and visitor facilities at Bath Racecourse which lies in the rural hinterland just to the north of the built-up area of the city alongside improving links between the Racecourse and the city centre through a Park & Ride and/or bus shuttle services, accords strongly with the aims and principles of the DMP. And yet this emphasis on developing the city and its surrounding rural hinterland as a visitor destination as a whole has not been translated into the Core Strategy.

(continued over)

(Humberts Leisure response to Policy B1 Question 6b continued)

In considering the Tourism Product, the DMP includes a number of priority areas including 'increasing accommodation capacity and choice' and 'strengthening the rural product to add to the range of things to do around Bath and spread the benefits of tourism more widely'. Northern Racing are seeking to spread the benefit of sporting, leisure and business tourism to Bath Racecourse, however, the Core Strategy as currently presented does not support this ambition (which accords with the DMP) and may in fact frustrate it as there is no flexibility built into the document in the face of rigid Green Belt, countryside and town centric policies.

In considering Infrastructure, the DMP has, as it's first priority, to make it easier to get in and out of Bath. The provision of an improved Park & Ride service from Bath Racecourse would assist this priority.

The LDF Evidence Base also includes the Council's Visitor Accommodation Study (VAS). This states that Bath is expected to accommodate significant growth in terms of jobs and people over the next twenty years (as now proposed in the Core Strategy) and that this will generate a demand for additional visitor accommodation in the area. It states that in general accommodation enterprises are doing well and performing at levels above the national average. The VAS includes a benchmarking study which suggests that Bath has less hotel accommodation than other historic cities of a comparable size and status and that this may reflect on the difficulty and cost of redevelopment in Bath.

As hotel consultants ourselves, Humberts Leisure would concur with this analysis. Bath is one of the most important destinations for national and international visitors. The DMP estimates that it receives 3/4 million staying visitors which is a large amount for such a relatively small city. It is renowned for the high price and difficulty of booking its visitor accommodation. These are all signs of a significant undersupply of visitor accommodation. However, with an extremely sensitive historic centre it is difficult to accommodate major new hotel development within the city centre. Moreover, the city is surrounded by Green Belt and AONB designations making it difficult to expand the city and meaning that any available land within the city will have a high price with many competing uses for development.

The VAS suggests that there is scope for adding 256-376 rooms by 2016 and 444-761 rooms by 2026. We have not yet been able to undertake our own hotel accommodation need assessment to review these figures, but we would suspect that simply given the information contained within the VAS that the higher figures are the more likely and it is possible that even these may be low. The VAS itself points out that the amount of visitor accommodation in other comparable cities grew faster during the last decade than at Bath. We believe that this is due to the difficulty of developing hotel accommodation in the city in the face of conservation constraints and competing higher value uses. It is notable that only in the last few years, during a recession when normal residential and office land prices have been suppressed, that a number of hotel proposals have come forward. However, this is a Core Strategy for the next 15 years and those market pressures that kept out hotels during the last decade will return. Indeed, the VAS warns that although there are a number of sites likely to come on stream in and around the city centre which could be used for hotel development, there are opportunity costs to consider which could constrain the growth of leisure tourism.

A hotel incorporated into the development of new, or redevelopment of existing, grandstands and supporting facilities at Bath Racecourse, linked to the town centre by a sustainable Park & Ride facility, could address this priority and help to alleviate some of this visitor demand pressure.

Objective 3 of the draft Core Strategy seeks to promote the tourism potential of other parts of the District by facilitating the provision of visitor accommodation. Northern Racing supports this objective, but feel that the Core Strategy policies that follow restrict any such hotel development outside of the city centre. The Core Strategy assumes that all the city's hotel accommodation needs can be accommodated within the city centre as indicated by policy B2. Even if the city centre were able to accommodate the quantitative need identified for up to 750 new hotel bedrooms by 2026, which we doubt, this does not mean it could address the qualitative need for a variety of types of hotels including those that provide an attractive countryside setting and are more convenient for those participating in countryside sports.

Objective 6 seeks to promote health and well being including encouraging social interaction and the 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.

In terms of sporting recreational facilities that encourage social interaction and support the city's visitor economy. The strategically two most important sports which the city has to offer are Rugby and

Horse Racing. We have scoured the Core Strategy for any policy to guide, or even mention the role of, Bath Racecourse, but there is none. There is, however, support in policy B1.8 for the development of a new Rugby Stadium for Bath RFC within the central area. On the basis that this is where the Council considers it appropriate to deal with strategic sporting tourism needs, then we feel that this is most appropriate location in the Core Strategy to prioritise and support the development of sporting tourism at Bath Racecourse.

Allowing the racecourse to adapt its product to the changing market and competition through the sensitive redevelopment of the site to provide improved grandstands incorporating hotel accommodation and improved visitor facilities would not conflict with the purposes of including the land in the Green Belt. It would not lead to any sprawl of Bath or Bristol or contribute to the merging of settlements. The countryside would remain safeguarded from encroachment, and the setting and special character of Bath would be preserved. On the other hand, improving facilities at the racecourse would support objectives for the use of the Green Belt by improving opportunities for access to the open countryside for the neighbouring urban populations and improving opportunities for outdoor sport and recreation.

The incorporation of a hotel and improved facilities including Park & Ride within a redevelopment of Bath Racecourse would support sporting, leisure and business tourism in Bath and its surrounding hinterland and should be a strategic priority of the Core Strategy following from the aim, vision, key principles and priorities of the Destination Management Plan and address the substantial shortage of visitor accommodation identified by the Council's Visitor Accommodation Study. As that study explains, this shortage can only get worse with the proposed growth of population and business set out in the Core Strategy. Policy B1 identifies the magnitude of that problem, but the Core Strategy places an over-reliance on a heavily constrained and competitive central area to address it.

Change sought to Section 8 of Policy B1 should be re-titled and amended as follows:-

make sound: 8 Tourism, Culture and Sport

- a Enable the provision of 500-750 new hotel bedrooms to widen the accommodation offer of the city and its surrounding area, increase overnight stays and the competitiveness of the city as a visitor and business destination.
- b Enable the development of a new stadium for Bath RFC within the Central Area.
- c Enable the provision for a new cultural/performance/arts venue within the Central Area.
- d Support the improvement of sport, leisure and hotel facilities at Bath Racecourse without compromising the openness of the Green Belt or harming the attractiveness of the AONB.

The additional wording to make the Core Strategy sound is underlined. This wording would support rural tourism and leisure development through the improvement of facilities at Bath Racecourse and therefore accord with national policy EC7 of PPS4. It would also provide flexibility in accordance with PPS12 to allow for some hotel development outside of the central area of Bath in accordance with the national Good Practice Guide on Planning for Tourism. The proposed wording would also accord with national policy in PPG2, PPS7, PPG13 and PPG17.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 321\2

Plan Reference: Policy CP13: Infrastructure Provision

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:

Respondent Number: 322 Respondent: Bath Spa University

RepresentationReference: 322\1 S

Plan Reference: Policy CP8: Green Belt

Representation (soundness): We act on behalf of Bath Spa University and hereby make a formal representation in support of Policy 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:

RepresentationReference: 322\2 S

Plan Reference: Policy B5: Strategic Policy for Bath's Universities

Representation (soundness): We act on behalf of Bath Spa University and hereby make a formal representation in support of Policy B5 - Strategic Policy for Bath's Universities. It is anticipated that Policy B5 will enable the delivery of redevelopment and intensification of the Newton Park Campus.

This will enable the provision for additional on campus student bed spaces and the renewal and improvement of academic space on site, enabling growth in the overall number of students living at Newton Park Campus and the shrinkage of the private lettings market in Bath.

Overall, there are overwhelming reasons for the provision for additional on-campus bed spaces / academic space as evidenced in the Bath Spa University Strategic Framework submitted as part of the Phase 1 planning application and we therefore concur with this policy.

The proposals for new student residential accommodation and academic facilities can be found in the Bath Spa University Strategic Framework 2010 and Newton Park Campus Masterplan - Rev 1 - 2011 which have been submitted to Bath and North East Somerset Council in support of Phase 1 academic development planning application, November 2010.

However, it should be noted that the Newton Park Masterplan analysed in detail options for the spatial provision of additional student accommodation and academic facilities within the substantial environmental constraints on the campus. The conclusion of this extensive analysis is that previously developed land outside of the Major Existing Development Site (MEDS) must be utilised if the new accommodation is to be provided.

We therefore contend that although there should be no change to the boundary of the Green Belt, the Local Planning Authority have adequate justification within the Masterplan for Newton Park Campus, PPS2 and the emerging Core Strategy Policies to extend the MEDS as identified in Figure 1 attached

We would therefore ask that this boundary change to the MEDS is incorporated as part of the Core Strategy.

Change sought to make sound: Revision of MEDS as evidence in Newton Park Campus Masterplan, Bath Spa University Strategic Framework, PPS2 and emerging Core Strategy as identified in Figure 1 attached.

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 322\3 S

Plan Reference: Policy CP8: Green Belt

Representation (soundness): We act on behalf of Bath Spa University and hereby make a formal representation to Policy CP8.

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:

Respondent Number: 323 Respondent: Mr and Mrs Tudgee

RepresentationReference: 323\1

Plan Reference: Paragraph 5.13

Representation 3.0 RURAL AREAS

(soundness): 3.1 Paragraph 5.13 of the draft Core Strategy advises that in the rural areas around 800 homes and 500 jobs are proposed, which includes only 250 dwellings over existing commitments. This would appear to be based on the Council's SHLAA Findings Report (December 2010) which advises that of the identified supply in the rural areas, 193 units have been built since 2006/07 and 368 have planning permission or are otherwise committed leaving a further 239 units of supply to be found on suitable, available and deliverable/developable sites in the rural areas.

3.2 The Future Growth and Requirements report (September 2010) advises that the rural areas are in need of a significant amount of new housing. The report advises that this need is said to be going unmet and that there will continue to be a backlog unless sites are identified through the LDF. We consider that the housing requirement for the rural areas identified by the draft Core Strategy is insufficient to meet the housing need in the rural areas, particularly as this leaves very little beyond completions and commitments to be built in the bulk of the plan period between now and 2026. In order to provide a more flexible and responsive supply of housing in the rural areas, we consider that a higher level growth option is necessary. We consider that this would be supported by the available evidence on need.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 323\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation 3.3 We generally support Policy RA1 which seeks to allow proposals for residential and employment **(soundness):** development in and adjoining the housing development boundary of, and of a scale and character appropriate to, the villages identified in Policy DW1 providing the village has,
a) at least 3 of the following key facilities within the village: post office, school, community meeting place and convenience shop, and
b) at least a daily Monday-Saturday public transport service to main centres, and
c) local community support for the principle of development can be demonstrated.

3.4 Paragraph 5.21 of the draft Core Strategy suggests that housing developments of a scale of “up to and around 30 dwellings” will be distributed as appropriate at the villages which meet the RA1 criteria will be acceptable. We assume that this means that more than one such development (i.e. amounting to in excess of 30 dwellings in total) will be permissible in any given village if deemed to be appropriate. We support this flexible approach which allows specific sites to be identified through the Site Allocations DPD based on the capacity of the individual settlements in terms of the range of sites that might be suitable and available, the level of local housing need and the aspirations of the local community towards community benefits that might be delivered in connection with housing or employment development. Such a strategy has been successfully and appropriately adopted by other authorities within the south west region and found to be a sound approach.

3.5 Bishop Sutton supports a variety of facilities such as a primary school, village hall, two churches, two pubs, a football club and benefits from a good bus service to Bristol (two buses operate Monday to Saturday via Bishop Sutton to and from Bristol with up to three services a day). It is rightly considered to be a sustainable settlement for accommodating appropriately scaled residential development for which Policy RA1 should apply and we support this approach as a sound one. This is recognised in paragraph 5.18 of the draft Core Strategy although the only other villages listed in Table 1 to meet the criteria and that have some capacity for development are said to be Timsbury, Batheaston, Temple Cloud, Farmborough (subject to the provision of a sustainable transport link to local shopping facilities) and Whitchurch. Furthermore, paragraph 5.20 advises that sites adjoining housing development boundaries in the Green Belt will not be acceptable. This effectively rules out any sites outside of the housing development boundaries of Farmborough, Whitchurch and Batheaston as well as limiting the search of sites adjoining the housing development boundaries of Timsbury and to a lesser extent Bishop Sutton. We consider that the draft Core Strategy should make it clearer which villages policy RA1 will be applicable to in order to avoid any misunderstanding and meet the tests of soundness.

3.6 The evidence makes it clear therefore that Bishop Sutton is one of only a few suitable locations for residential development in the Rural Areas having regard to the criteria which the draft Core Strategy applies. The SHLAA Findings Report (December 2010) suggests that there are no suitable and available sites within the existing housing development boundary of Bishop Sutton that can meet the identified need. A site or sites adjoining the settlement boundary will therefore need to be identified within the Site Allocations DPD.

4.0 LAND AT HAM LANE, BISHOP SUTTON

4.1 Our clients own 0.3 hectares of land at Ham Lane which is identified on the plan attached as Appendix 1. The site adjoins the housing development boundary of Bishop Sutton and is outside the green belt as identified by the adopted local plan proposals map. The site is situated on the north eastern side of Bishop Sutton to the north of the A368 which runs through the centre of the village. The site is bounded by Ham Lane to the east, and Stitchings Shord Lane to the south. On the opposite sides of both lanes is existing residential development and to the south of Stitchings Shord Lane is the more recent Cappard’s Farm Housing development. Chew Valley Caravan Park, Marlborough House and cottages enclose the site to the north and north west. To the west of the site is a tennis court with a cottage and cold store.

The site is relatively flat and surrounded by mature hedgerows and trees to the east and south. The current land use consists of pasture fields within a predominately residential area. The site has little agricultural value given its relatively small size and distance from any other agricultural land.

4.2 Appendix 1E of the SHLAA Findings Report (December 2010) appraises a site (BIS1) which includes our client’s land. It suggests that the BIS1 site is unsuitable because it is outside the Housing Development Boundary but Policy RA1 refers to potentially suitable sites being either in or adjoining such boundaries. Our client’s land adjoins the Housing Development Boundary.

4.3 The SHLAA also suggests that the BIS1 site would be unsuitable for reasons relating to visual impact

and the existing character of the land, citing a previously dismissed Section 78 appeal for a single dwelling in 1993 as justification. However, the context to that appeal was that it related to an unjustified proposal for housing development outside of the adopted settlement development boundary which was as a matter of principle contrary to the relevant policies of the time. The same objection would not be valid now in respect of a proposal for a planned housing allocation of the site to meet an identified need, particularly as the character of the surrounding area has altered significantly in the intervening period as a result of new development. We consider therefore that the SHLAA assessment of the BIS1 site is unjustified.

4.4 In any case, our client's land is only part of the BIS1 site and Bridges Design Associates Ltd has prepared an initial Landscape Assessment which provides evidence that the SHLAA assessment is unjustified. The Landscape Assessment (which can be provided on request) concludes that the hedgebanks which enclose it and forms the main landscape feature, could be largely retained and reinstated as necessary around any new access should the site be developed for housing. Any views from potential residential development on site would therefore be limited by boundary vegetation and very localised, being restricted to views from the immediately adjacent roads. The Assessment concludes that residential development would be in keeping with the adjacent land uses and whilst some views may change this should not result in any significant detrimental impact on surrounding residential properties views. A well-designed, landscaped residential development on this site should integrate well with the local landscape character of the village.

4.5 FMW Consultancy has prepared an initial transport appraisal of the site which advises that the site benefits from reduced traffic flows on Ham Lane due to no entry signs at the Ham Lane/Hollowbrook Lane junction, while the Highway Authority is proposing to restrict parking and waiting on Ham Lane and The Street (A368). Although visibility to the right at Ham Lane and The Street junction is currently substandard, the low volume of traffic that is likely to be generated by the potential development of the site may not require improvements to the junction. However, a build-out to advance the give way line and increase the visibility could be introduced if required by the Highway Authority. Site access can be provided from Ham Lane, Stitchings Shord Lane or a revised Ham Lane/ Stitchings Shord Lane junction, with Stitchings Shord Lane being the most appropriate option. The main pedestrian link from the site to surrounding facilities is provided via Ham Lane. Ham Lane has a calm traffic environment and fulfils the Manual for Streets criteria for good shared surface streets. The site has good access to local facilities with the post office, grocery store, pub and primary school all within desirable walking distance. A nearby bus stop provides eight daily options to Chew Magna and the services also allow weekday trips to Bristol, Bath and Weston Super Mare. The findings demonstrate that the site is suitable for a residential development from a highways and transport perspective.

4.6 We consider therefore that our client's land at Ham Lane, Bishop Sutton is suitable for a residential development for approximately 5 – 9 houses and could contribute towards the housing requirement identified for the Rural Areas within the draft Core Strategy.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 323\3

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation 2.0 DISTRICT-WIDE SPATIAL STRATEGY

(soundness): 2.1 We are thus far unconvinced that the housing requirement set by the draft Core Strategy, i.e. 11,000, which is just over half of what was identified through the RSS Proposed Changes (i.e. 21,300), is appropriate and justified. We are concerned that the housing need will not be adequately met and as a

result the Core Strategy runs the risk of failing the tests of soundness (i.e. the need to be justified and effective) on this basis.

2.2 However, we support Policy DW1 as far as it seeks to promote sustainable development including by locating development in the rural areas at settlements with a good range of local facilities and with good access to public transport. This approach is consistent with PPS7 which advises that planning policies should support suitably located and designed development necessary to facilitate the economic and social well being of rural areas and their communities, including the provision of adequate housing to meet identified local needs. We consider this to be a sound approach.

2.3 We support the inclusion of Bishop Sutton within Table 1 as a village to which subsequent policies RA1 and RA2 will apply. However, we consider that the inclusion of some of the other villages may be unsound for reasons which we expand upon later in these representations.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 323\4

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation 4.0 LAND AT HAM LANE, BISHOP SUTTON

(soundness): 4.1 Our clients own 0.3 hectares of land at Ham Lane which is identified on the plan attached as Appendix 1. The site adjoins the housing development boundary of Bishop Sutton and is outside the green belt as identified by the adopted local plan proposals map. The site is situated on the north eastern side of Bishop Sutton to the north of the A368 which runs through the centre of the village. The site is bounded by Ham Lane to the east, and Stitchings Shord Lane to the south. On the opposite sides of both lanes is existing residential development and to the south of Stitchings Shord Lane is the more recent Cappard's Farm Housing development. Chew Valley Caravan Park, Marlborough House and cottages enclose the site to the north and north west. To the west of the site is a tennis court with a cottage and cold store. The site is relatively flat and surrounded by mature hedgerows and trees to the east and south. The current land use consists of pasture fields within a predominately residential area. The site has little agricultural value given its relatively small size and distance from any other agricultural land.

4.2 Appendix 1E of the SHLAA Findings Report (December 2010) appraises a site (BIS1) which includes our client's land. It suggests that the BIS1 site is unsuitable because it is outside the Housing Development Boundary but Policy RA1 refers to potentially suitable sites being either in or adjoining such boundaries. Our client's land adjoins the Housing Development Boundary.

4.3 The SHLAA also suggests that the BIS1 site would be unsuitable for reasons relating to visual impact and the existing character of the land, citing a previously dismissed Section 78 appeal for a single dwelling in 1993 as justification. However, the context to that appeal was that it related to an unjustified proposal for housing development outside of the adopted settlement development boundary which was as a matter of principle contrary to the relevant policies of the time. The same objection would not be valid now in respect of a proposal for a planned housing allocation of the site to meet an identified need, particularly as the character of the surrounding area has altered significantly in the intervening period as a result of new development. We consider therefore that the SHLAA assessment of the BIS1 site is unjustified.

4.4 In any case, our client's land is only part of the BIS1 site and Bridges Design Associates Ltd has

prepared an initial Landscape Assessment which provides evidence that the SHLAA assessment is unjustified. The Landscape Assessment (which can be provided on request) concludes that the hedgebanks which enclose it and forms the main landscape feature, could be largely retained and reinstated as necessary around any new access should the site be developed for housing. Any views from potential residential development on site would therefore be limited by boundary vegetation and very localised, being restricted to views from the immediately adjacent roads. The Assessment concludes that residential development would be in keeping with the adjacent land uses and whilst some views may change this should not result in any significant detrimental impact on surrounding residential properties views. A well-designed, landscaped residential development on this site should integrate well with the local landscape character of the village.

4.5 FMW Consultancy has prepared an initial transport appraisal of the site which advises that the site benefits from reduced traffic flows on Ham Lane due to no entry signs at the Ham Lane/Hollowbrook Lane junction, while the Highway Authority is proposing to restrict parking and waiting on Ham Lane and The Street (A368). Although visibility to the right at Ham Lane and The Street junction is currently substandard, the low volume of traffic that is likely to be generated by the potential development of the site may not require improvements to the junction. However, a build-out to advance the give way line and increase the visibility could be introduced if required by the Highway Authority. Site access can be provided from Ham Lane, Stitchings Shord Lane or a revised Ham Lane/ Stitchings Shord Lane junction, with Stitchings Shord Lane being the most appropriate option. The main pedestrian link from the site to surrounding facilities is provided via Ham Lane. Ham Lane has a calm traffic environment and fulfils the Manual for Streets criteria for good shared surface streets. The site has good access to local facilities with the post office, grocery store, pub and primary school all within desirable walking distance. A nearby bus stop provides eight daily options to Chew Magna and the services also allow weekday trips to Bristol, Bath and Weston Super Mare. The findings demonstrate that the site is suitable for a residential development from a highways and transport perspective.

4.6 We consider therefore that our client's land at Ham Lane, Bishop Sutton is suitable for a residential development for approximately 5 – 9 houses and could contribute towards the housing requirement identified for the Rural Areas within the draft Core Strategy.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 324 Respondent: Wellow Parish Council

RepresentationReference: 324\1 S

Plan Reference: Whole Document

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 325 Respondent: Taylor Wimpey UK Ltd.

RepresentationReference: 325\1

Plan Reference: Policy KE1: Keynsham Spatial Strategy

Representation THE COUNCIL'S RECOGNITION OF THE STRATEGICALLY IMPORTANT LOCATION OF
(soundness): KEYNSHAM IS WELCOMED TOGETHER WITH THE COUNCIL'S ACKNOWLEDGEMENT OF KEYNSHAM'S POTENTIAL AS "A MORE SUSTAINABLE, DESIRABLE AND WELL CONNECTED PLACE IN WHICH TO LIVE AND WORK" (PAGE 14). POLICY DW1 RESPONDS TO THIS FUTURE ROLE FOR KEYNSHAM BY IDENTIFYING THE TOWN AS A FOCUS FOR NEW HOUSING, JOBS AND COMMUNITY FACILITIES. DIAGRAM 4 (PAGE 21) IDENTIFIES A HOUSING ALLOCATION FOR KEYNSHAM OF 1,500 HOMES PROPOSED THROUGH DELIVERING HOUSING ON SITES INCLUDING THE ALLOCATED LOCAL PLAN HOUSING SITE 'K2' WHICH COULD ACCOMMODATE CIRCA. 530 DWELLINGS ('SHLAA REPORT OF FINDINGS'). HOWEVER, THE 'SHLAA REPORT OF FINDINGS' (DECEMBER 2010) CHANGES THE APPROACH THE COUNCIL HAS TAKEN WITHIN THE LOCAL PLAN (POLICY GDS.1 'K2') IN RESPECT OF THE PRIMARY MEANS OF ACCESSING SITE K2B AND SUGGESTS THAT THE PRIMARY VEHICULAR ACCESS TO THIS SITE SHOULD BE FROM CHARLTON ROAD ACROSS ABBOTS WOOD (GREEN BELT LAND) AND NOT FROM PARK ROAD AS IDENTIFIED WITHIN THE LOCAL PLAN. THIS NEW ACCESS ARRANGEMENT DOES NOT APPEAR TO BE SUPPORTED BY ANY Bath and North East Somerset's Core Strategy – Publication Stage Representation Form HIGHWAY EVIDENCE WITHIN THE SHLAA TO DEMONSTRATE THAT THE ACCESS IS DELIVERABLE AND JUSTIFIED FOR SITE K2B OR WILL BE ABLE TO DELIVER CIRCA. 530 DWELLINGS ON SITE K2. CONVERSELY THE COUNCIL'S HIGHWAYS OFFICER RAISED NO OBJECTION TO THE MEANS OF ACCESSING SITE K2B FROM PARK ROAD AT THE LOCAL PLAN INQUIRY OR IN RESPECT OF PLANNING APPLICATION 09/04351/FUL.. (REFER TO THE SEPARATE NOTE ON THE 'SHLAA – REPORT OF FINDINGS APPENDIX 1C – KEYSNHAM SITE ASSESSMENTS – DECEMBER 2010)

Change sought to THERE IS NO JUSTIFICATION FOR CHANGING THE MEANS OF ACCESS TO SITE K2B FROM
make sound: THAT IDENTIFIED WITHIN THE LOCAL PLAN POLICY (POLICY GDS.1 K2) WHERE ACCESS IS SHOWN FROM PARK ROAD. ACCESS TO SITE K2B SHOULD REVERT TO THAT IDENTIFIED IN THE LOCAL PLAN AND SHOULD NOT BE TAKEN FROM CHARLTON ROAD.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 325\2

Plan Reference: Policy KE1: Keynsham Spatial Strategy

Representation POLICY KE1 HIGHLIGHTS THE NEED TO "MAINTAIN THE GREEN BELT SURROUNDING KEYNSHAM"
(soundness): (POINT 1b) WHILST ALSO DELIVERING AROUND 1,500 HOMES IN KEYNSHAM. HOWEVER, THE 'SHLAA REPORT OF FINDINGS' (DECEMBER 2010) FOR SITE K2 'SOUTH WEST KEYNSHAM' IDENTIFIES THAT THE PRIMARY MEANS OF ACCESS TO SITE K2B SHOULD "BE FROM CHARLTON ROAD WITH ROUTE CROSSING INTERVENING WOODLAND TRUST LAND". THE WOODLAND TRUST LAND IS GREEN BELT LAND AND THEREFORE ACCESSING SITE K2B ACROSS GREEN BELT LAND WOULD BE CONTRARY TO THE GUIDANCE CONTAINED WITHIN POLICY KE1 AND TO NATIONAL PLANNING POLICY GUIDANCE RELATING TO THE PROTECTION OF GREEN BELT LAND FROM INAPPROPRIATE DEVELOPMENT UNLESS EXCEPTIONAL CIRCUMSTANCES EXIST.

THERE APPEARS TO BE NO HIGHWAY JUSTIFICATION TO SUPPORT THE COUNCIL'S IDENTIFICATION OF THE PRINCIPAL MEANS OF ACCESS TO SITE K2B BEING FROM CHARLTON ROAD AS OPPOSED TO THE LOCAL PLAN'S IDENTIFIED MEANS OF ACCESS TO SITE K2B BEING FROM PARK ROAD. ACCESS FROM PARK ROAD DOES NOT COMPROMISE THE INTEGRITY OF KEYNSHAM'S GREEN BELT.

THE DELIVERY OF HOUSING ON SITE K2B (WHICH FORMS PART OF KEYNSHAM'S HOUSING Bath and

North East Somerset's Core Strategy – Publication Stage Representation Form CONTRIBUTION BETWEEN 2006-2026) MAY BE COMPROMISED BY THE COUNCIL'S CHANGE OF APPROACH TOWARDS ACCESSING THE SITE ACROSS GREEN BELT LAND AND THE OWNERSHIP OF THIS LAND BY THE WOODLAND TRUST. THE COUNCIL HAS PROVIDED NO MASTERPLAN EVIDENCE TO SHOW THAT AN ACCEPTABLE SITE LAYOUT AND SATISFACTORY HOUSING NUMBERS CAN BE ACHIEVED ON SITE K2B WHERE THE PRIMARY ACCESS FROM CHARLTON ROAD.

(REFER TO THE SEPARATE NOTE ON THE 'SHLAA – REPORT OF FINDINGS APPENDIX 1C – KEYNSHAM SITE ASSESSMENTS – DECEMBER 2010)

Change sought to make sound: NO JUSTIFICATION IS PROVIDED FOR CHANGING THE MEANS OF ACCESS TO SITE K2B FROM PARK ROAD TO CHARLTON ROAD, THE LATTER WHICH WILL RESULT IN DEVELOPMENT WITHIN THE GREEN BELT.

MEANS OF ACCESS TO SITE K2B SHOULD REVERT TO THAT STATED WITHIN POLICY GDS.1

K2 OF THE ADOPTED LOCAL PLAN WHEREBY ACCESS TO THE SITE FROM PARK ROAD WAS CONSIDERED ACCEPTABLE BY THE LOCAL PLAN INSPECTOR. FURTHERMORE, NO OBJECTION WAS RAISED BY THE COUNCIL'S HIGHWAYS OFFICER TO ACCESSING SITE K2B FROM PARK ROAD IN RESPECT OF PLANNING APPLICATION 09/04351/FUL.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 325\3

Plan Reference: Policy KE2: Keynsham Town Centre/Somerdale Strategic Policy

Representation (soundness): DELIVERY OF THE DEVELOPMENT PROPOSALS COMPRISING THE TOWN CENTRE / SOMERDALE STRATEGIC SITE, IN PARTICULAR THE PROVISION OF UP TO 700 DWELLINGS, IS RELIANT UPON THE IMPLEMENTATION OF SIGNIFICANT HIGHWAY, FLOOD PROTECTION AND SEWERAGE INFRASTRUCTURE WORKS AS WELL AS EXTENSIVE TRAFFIC MANAGEMENT IMPROVEMENTS WITHIN THE TOWN CENTRE IN ORDER TO ENSURE THAT SUCH AN INTENSIVE FORM OF DEVELOPMENT DOES NOT ADVERSELY AFFECT THE FUNCTIONING AND CHARACTER OF THE TOWN.

IT IS CONSIDERED THAT, BEFORE TAKING FORWARD THIS STRATEGIC SITE, FURTHER INVESTIGATIONS ARE REQUIRED RELATING TO THE EXTENSIVE INFRASTRUCTURE REQUIREMENTS ASSOCIATED WITH BRINGING FORWARD THIS ALLOCATION, MANY ELEMENTS OF WHICH (SEWERAGE CAPACITY, FLOOD PROTECTION, HIGHWAY INFRASTRUCTURE) WILL NEED TO BE DELIVERED IN ADVANCE OF ANY DEVELOPMENT.

THESE INVESTIGATIONS WILL ENSURE THAT THE PROPOSALS FOR DEVELOPMENT AT THIS LOCATION, IN PARTICULAR THE PROVISION OF UP TO 700 DWELLINGS, AS WELL AS THE PHYSICAL AND SOCIAL INFRASTRUCTURE, ARE DELIVERABLE.

Change sought to make sound: FURTHER TECHNICAL STUDIES ARE REQUIRED REGARDING FLOOD MITIGATION, SEWERAGE CAPACITY, HIGHWAY INFRASTRUCTURE AND TRAFFIC MANAGEMENT REQUIREMENTS ASSOCIATED WITH IMPLEMENTING THIS STRATEGIC SITE TO DEMONSTRATE THAT DEVELOPMENT CAN OVERCOME ITS CONSTRAINTS AND IS CAPABLE OF DELIVERY WITHIN THE NEXT 15 YEARS.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 325\4

Plan Reference: Policy CP8: Green Belt

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:

Respondent Number: 326 Respondent: Patricia Pick

RepresentationReference: 326\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation (soundness): I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES this protecting this precious land.

I am pleased that the new housing numbers identified by BANES can be met by utilizing brown field sites, empty properties, allocating small housing developments around identified villages within the County and using certain redundant agricultural buildings.

This is great progress from the previously massive housing developments being thrust on this Country

and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 326\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 326\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 327 **Respondent:** Susan Thatcher

RepresentationReference: 327\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES this protecting this precious land.

I am pleased that the new housing numbers identified by BANES can be met by utilizing brown field sites, empty properties, allocating small housing developments around identified villages within the County and using certain redundant agricultural buildings.

This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 327\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 327\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 328 **Respondent:** David Reeve

RepresentationReference: 328\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness):

particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES this protecting this precious land.

I am pleased that the new housing numbers identified by BANES can be met by utilizing brown field sites, empty properties, allocating small housing developments around identified villages within the County and using certain redundant agricultural buildings.

This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 328\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with **(soundness):** small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 328\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** 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:

Respondent Number:	329	Respondent: Barbara Reeve
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RepresentationReference: 329\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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I am pleased that the new housing numbers identified by BANES can be met by utilizing brown field sites, empty properties, allocating small housing developments around identified villages within the County and using certain redundant agricultural buildings.

This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 329\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 329\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must
(soundness): 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:

Respondent Number: 330 Respondent: Norman Bellworthy

RepresentationReference: 330\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES this protecting this precious land.

I am pleased that the new housing numbers identified by BANES can be met by utilizing brown field sites, empty properties, allocating small housing developments around identified villages within the County and using certain redundant agricultural buildings.

This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 330\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 330\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must
(soundness): 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:

Respondent Number: 331 **Respondent:** Jean Bellworthy

RepresentationReference: 331\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation (soundness): I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES this protecting this precious land.

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 331\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation (soundness): Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 331\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 332 **Respondent:** Nicholas Owen

RepresentationReference: 332\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 332\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 332\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 333 **Respondent:** Sandra Webb

RepresentationReference: 333\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 333\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 333\3 S

Plan Reference: Policy CP8: Green Belt

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

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

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 334 **Respondent:** T. Davies

RepresentationReference: 334\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt **(soundness):** particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 334\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 334\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 335 **Respondent:** Jennifer Davies

RepresentationReference: 335\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 335\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 335\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 336 **Respondent:** Muriel Gibbs

RepresentationReference: 336\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 336\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 336\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 337 **Respondent:** R. Studley

RepresentationReference: 337\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 337\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 337\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 338 **Respondent:** A.J. Studley

RepresentationReference: 338\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness):

particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES this protecting this precious land.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 338\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 338\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must
(soundness): 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:

Respondent Number: 339 **Respondent:** Susan Maggs

RepresentationReference: 339\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 339\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 339\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must
(soundness): 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:

Respondent Number: 340 Respondent: Charlotte Maggs

RepresentationReference: 340\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 340\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 340\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must
(soundness): 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:

Respondent Number: 341 **Respondent:** Terence Wittner

RepresentationReference: 341\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 341\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 341\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 342 **Respondent:** Jason Stone

RepresentationReference: 342\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 342\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 342\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 343 **Respondent:** D. Peacey

RepresentationReference: 343\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 343\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 343\3 S

Plan Reference: Policy CP8: Green Belt

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

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

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 344 **Respondent:** M. Peacey

RepresentationReference: 344\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt **(soundness):** particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 344\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 344\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 345 **Respondent:** Beatrix Vasarhelyi

RepresentationReference: 345\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath witin BANES this protecting this precious land.

I am pleased that the new housing numbers identified by BANES can be met by utilizing brown field sites, empty properties, allocating small housing developments around identified villages within the County and using certain redundant agricultural buildings.

This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 345\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 345\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 346 **Respondent:** J. Keep

RepresentationReference: 346\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath witin BANES this protecting this precious land.

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and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 346\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 346\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 347 **Respondent:** James Lawson

RepresentationReference: 347\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES this protecting this precious land.

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 347\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 347\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 348 **Respondent:** E. Webb

RepresentationReference: 348\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness):

particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 348\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 348\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must
(soundness): 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:

Respondent Number:	349	Respondent: Janet Webb
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RepresentationReference: 349\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 349\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 349\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must
(soundness): 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:

Respondent Number: 350 Respondent: Susan Palmer

RepresentationReference: 350\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 350\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 350\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must
(soundness): 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:

Respondent Number: 351 **Respondent:** R. Palmer

RepresentationReference: 351\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 351\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 351\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 352 **Respondent:** Richard Hall

RepresentationReference: 352\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 352\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 352\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 353 **Respondent:** Angela Hall

RepresentationReference: 353\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath witin BANES this protecting this precious land.

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 353\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 353\3 S

Plan Reference: Policy CP8: Green Belt

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

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

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 354 **Respondent:** R Penney

RepresentationReference: 354\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt **(soundness):** particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 354\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 354\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 355 **Respondent:** P Penney

RepresentationReference: 355\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath witin BANES this protecting this precious land.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 355\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 355\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 356 **Respondent:** Peter Goodwin

RepresentationReference: 356\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 356\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 356\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 357 **Respondent:** Anita Goodwin

RepresentationReference: 357\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 357\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 357\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 358 **Respondent:** Clive Powell

RepresentationReference: 358\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorses the Draft Core Strategy which now protects the Green Belt
(soundness):

particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 358\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 358\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must
(soundness): 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:

Respondent Number:	359	Respondent: J.E. Powell
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RepresentationReference: 359\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly round Whitchurch. I find it Sound and Legal for the following reasons:

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 359\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 359\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must
(soundness): 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:

Respondent Number: 360 Respondent: S. Evans

RepresentationReference: 360\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 360\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 360\3 S

Plan Reference: Policy CP8: Green Belt

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 361 **Respondent:** Sylvia Cox

RepresentationReference: 361\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

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**Change sought to
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Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 361\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 361\3 S

Plan Reference: Policy CP8: Green Belt

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(soundness): also be care taken that developers do no take advantage of the "Community Right to Build".

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 362 **Respondent:** Mervyn Cox

RepresentationReference: 362\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 362\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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(soundness): small scale development only.

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Change sought to make legally compliant:

RepresentationReference: 362\3 S

Plan Reference: Policy CP8: Green Belt

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 363 **Respondent:** James Thrower

RepresentationReference: 363\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt
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RepresentationReference: 363\3 S

Plan Reference: Policy CP8: Green Belt

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 364 **Respondent:** Joyce Thrower

RepresentationReference: 364\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt **(soundness):** particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

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Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 364\2 S

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Change sought to make legally compliant:

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Plan Reference: Policy CP8: Green Belt

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 365 **Respondent:** N. Farrance

RepresentationReference: 365\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

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Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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Plan Reference: Policy CP8: Green Belt

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 366 **Respondent:** Diana Farrance

RepresentationReference: 366\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

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RepresentationReference: 366\2 S

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Change sought to make legally compliant:

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 367 **Respondent:** Trevor Davis

RepresentationReference: 367\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

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**Change sought to
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Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 367\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 367\3 S

Plan Reference: Policy CP8: Green Belt

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 368 **Respondent:** Sheila Davis

RepresentationReference: 368\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness):

particularly round Whitchurch. I find it Sound and Legal for the following reasons:

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 368\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 368\3 S

Plan Reference: Policy CP8: Green Belt

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(soundness): also be care taken that developers do not take advantage of the "Community Right to Build".

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 369 **Respondent:** Anne Griffin

RepresentationReference: 369\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly round Whitchurch. I find it Sound and Legal for the following reasons:

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 369\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 369\3 S

Plan Reference: Policy CP8: Green Belt

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

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 370 Respondent: David Whelan

RepresentationReference: 370\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

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(soundness): particularly round Whitchurch. I find it Sound and Legal for the following reasons:

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 370\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 370\3 S

Plan Reference: Policy CP8: Green Belt

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 371 **Respondent:** June Carter

RepresentationReference: 371\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 371\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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(soundness): small scale development only.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 371\3 S

Plan Reference: Policy CP8: Green Belt

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(soundness): also be care taken that developers do no take advantage of the "Community Right to Build".

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 372 **Respondent:** Timsbury Parish Council

RepresentationReference: 372\1

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation The Parish Council resolved to advise Bath & NE Somerset Council that it wished for the phrase "and
(soundness): adjoining" to be removed from Policy RA1 on p. 96 of the consultation document.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 373 **Respondent:** Ann Marshall

RepresentationReference: 373\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 373\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

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**Change sought to
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Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 373\3 S

Plan Reference: Policy CP8: Green Belt

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 374 **Respondent:** Graham Carter

RepresentationReference: 374\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly round Whitchurch. I find it Sound and Legal for the following reasons:

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Change sought to make legally compliant:

RepresentationReference: 374\2 S

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Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 374\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 375 **Respondent:** F. Box

RepresentationReference: 375\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath witin BANES this protecting this precious land.

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 375\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 376 **Respondent:** J. Edwards

RepresentationReference: 376\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt **(soundness):** particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 376\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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Representation (legal compliance):

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RepresentationReference: 376\3 S

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 377 **Respondent:** Judith Edwards

RepresentationReference: 377\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 377\2 S

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 377\3 S

Plan Reference: Policy CP8: Green Belt

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 378 Respondent: Lilian Hayward

RepresentationReference: 378\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

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Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 378\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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Change sought to make legally compliant:

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Plan Reference: Policy CP8: Green Belt

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relevant.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 379 **Respondent:** Michael Searle

RepresentationReference: 379\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly around Whitchurch. I find it Sound and Legal for the following reasons:

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Plan Reference: Policy CP8: Green Belt

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 380 **Respondent:** Molly Ford

RepresentationReference: 380\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
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Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 380\2 S

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RepresentationReference: 380\3 S

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 381 **Respondent:** M.A. Ford

RepresentationReference: 381\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlyya round Whitchurch. I find it Sound and Legal for the following reasons:

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Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 381\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 381\3 S

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 382 **Respondent:** Dennis Gould

RepresentationReference: 382\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

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Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 382\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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Change sought to make legally compliant:

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Plan Reference: Policy CP8: Green Belt

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 383 **Respondent:** Pamela Gould

RepresentationReference: 383\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

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Plan Reference: Policy CP8: Green Belt

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 384 **Respondent:** Wiltshire Council

RepresentationReference: 384\1

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation Generally the plan is welcomed, in particular the overall strategy to focus growth at Bath, Keynsham
(soundness): and the larger settlements in Somer Valley. However, there are concerns regarding the soundness of the strategy with particular regard to the sub-regional context, level of future housing provision, Bath Spatial Strategy and transportation.

Sub-regional context

As stated in Paragraph 1.25, Sub-regional context, it is acknowledged that "the Spatial Strategy for B&NES must take account of the strategies and programmes of neighbouring authorities, especially in the west of England." Wiltshire Council supports this in principle and recognises that it is right for the Core Strategy to explicitly consider the wider west of England sub-regional area. However, there is concern that there is insufficient recognition of those areas outside of this area, in particular within Wiltshire.

Furthermore, Paragraph 1.18 states that the strategy has sought to take into account functional relationships with neighbouring authorities. Despite this there is concern that these relationships are not fully explored or responded to within the Core Strategy. In the north and western parts of Wiltshire, there are clear functional relationships with B&NES particularly Bath, as evidenced by commuting patterns and public transport services.

In particular it is considered that the Core Strategy should ensure an adequate supply of deliverable housing during the plan period. (discussed below). Without this significant pressure will be exerted on the wider West of England Housing Market Area (HMA), which extends to the West Wiltshire area (former West Wiltshire district) and as a result other adjoining HMAs within Wiltshire.

The functional relationships that exist between Wiltshire and B&NES requires cross boundary solutions. The Wiltshire 2026: Planning For Wiltshire's Future (Consultation document to inform the Wiltshire Core Strategy) was subject to public consultation at the end of 2009. This document recognises the wider sub-regional context and the functional relationships that exist between settlements within Wiltshire and neighbouring authorities. In particular it acknowledges that Trowbridge and surrounding areas see approximately 7,000 people out commute to centres such as Bath and Bristol. The Wiltshire Core Strategy is currently being prepared and will support housing and employment growth to reduce out-commuting however it recognises that such objectives can only be met by working closely with neighbouring authorities.

Finally Core Policy 6e 'A Prosperous Economy' recognises that the delivery of economic objectives will require the authority to work "with local communities and partners". Whilst such an approach is supported and encouraged, a lack of sub-regional focus means that the document is silent on the potential to consider cross-border opportunities to develop strong employment networks. The Core Strategy should be updated to signal a clear commitment to engage with adjacent authorities proactively on such matters.

Housing Requirement

Paragraph 1.23 acknowledges the drivers behind 'development need' including population change, the rapid decline in household size and increased separation rates, as well as the need to provide for non-economically active population. However, the assessment of future household growth does not appear to consider these drivers of population change projections due to the perceived doubts over the reliability of such data, as it simply extrapolates trends over time. As such, the focus on job-led household growth does not appear to fully take into account demographic change which is identified as an objective within the Core Strategy document.

In terms of the overall scale of growth Policy DW1 sets the overall housing requirement of 11,000 homes over the plan period (2006-2026). This represents a significant reduction in the overall provision of housing included in the previous consultation, Spatial Options (October 2009), which proposed 15,500 new homes.

Whilst the Spatial Options document did not provide for the housing numbers identified in the Secretary of State's Proposed Modifications to the South West Regional Spatial Strategy (RSS) of 21,300 dwellings, it did plan for housing provision in accordance with the draft RSS (June 2006) housing requirements and stated:

"If this level of housing is not provided then it will have serious implications, preventing some people having access to a decent home, making housing less affordable (to buy or rent) and in the longer term damaging to the local economy by reducing labour supply and mobility." (Spatial Options document, para 2.9)

It is not clear how the revised numbers now proposed reconcile with this statement in the Spatial Options document.

While it is recognised that there is the need to move away from regionally imposed targets in light of the Government's stated intention to abolish the RSS, Wiltshire Council is concerned that the evidence underpinning the new housing requirement does not identify sufficient housing in order to meet stated objectives of the plan:

- Objective 1 - reducing the need to travel by achieving closer alignment of jobs, homes;
- Objective 5 - enabling delivery of new homes needed to respond to expected demographic and social changes and to support the labour supply to meet our economic development objectives.

Indeed under the section of Strategic Issues for Bath (No.6) it is clearly identified that:

"The housing market is particularly expensive to penetrate and this contributes to a dislocation of workers from workspace and exacerbates the level of in-commuting from lower cost locations. More housing and more affordable housing is needed to support economic growth, increase the co-location of jobs and workers, and address the needs of households on the housing register."

This statement is welcomed, as the lower cost locations referred to are likely to include those found within western Wiltshire. Furthermore under the 'Strategic Issues for Bath' (No.7) it is acknowledged that "There is a significant imbalance between the resident workforce and jobs. The main place of employment for about 30% of the resident workforce is outside Bath and the city imports many workers from beyond its boundaries".

However, there is little in the way of evidence to justify to what extent a housing provision of 6,000 and projected job growth of 5,700 over the plan period in Bath will address the existing imbalance between workforce and jobs. This is of concern, particularly as the Strategy is now proposing lower levels of housing growth than in the Spatial Options document. Although paragraph 1.27 seeks to describe how current commuting patterns can be addressed: "The Spatial Strategy begins to address the existing commuting imbalance (net in-commuting) by directing more homes than jobs to the city", there appears to be a lack of information to justify this position and the limited recognition of existing commuting flows as well as the functional relationships that exist with other authorities, including Wiltshire.

In summary, there is concern that the results of the job-led household growth may not go far enough in terms of addressing existing and future imbalances between jobs and housing and therefore address current net commuting flows into Bath. Furthermore it is not clear how, if at all, future changes in MoD employment provision have been factored into the analysis.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 384\2

Plan Reference: Policy B1: Bath Spatial Strategy

Representation (soundness): Paragraph 1.26 states that "The strategy is to locate new development in the most sustainable locations and therefore the priority is to steer growth to brownfield land in urban areas of Bath, Keynsham and the larger settlements of Somer Valley.

While the aim to focus on regeneration sites is recognised in an environmentally constrained city such

as Bath, there is a reliance on complex regeneration sites which could constrain the ability of Bath to bring forward housing at the right time. A significant proportion of Bath's future housing (some 2,500) will come forward within Bath's neighbourhoods where surplus MoD land will play a major role. (Policy B1(a)), as well as the western corridor.

There is concern that if the delivery is not achieved in accordance with the principle of prioritising urban 'brownfield' sites, with no greenfield contingency (Policy DW1 proposes no strategic change to the boundaries of Bath), it may have significant implications on the wider sub-area and put pressure on the towns of Wiltshire in terms of housing demand and also further exacerbate current unsustainable commuting patterns. There is therefore particular concern regarding the over reliance of brownfield / regenerations sites to deliver the development strategy for Bath. This concern is compounded by paragraph 1.36 'Contingency' which suggests that contingency sites will maintain the strategy of "a priority on urban focussed brownfield opportunities."

While the overall emphasis on delivering growth through brownfield land is reasonable, consideration also needs to be given to contingency. It is noted that the Spatial Options document did identify a greenfield urban extension which at that time was considered suitable for development. With appropriate policy controls to protect the strategic landscape there appears to be no reason why suitable greenfield sites could not be identified as potential development areas over the plan period.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 384\3

Plan Reference: Policy CP13: Infrastructure Provision

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:

RepresentationReference: 384\4

Plan Reference: Paragraph 6.94

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:

RepresentationReference: 384\5

Plan Reference: Paragraph 6.101

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:

RepresentationReference: 384\6

Plan Reference: Paragraph 6.94

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:

RepresentationReference: 384\7

Plan Reference: Paragraph 6.98

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:

Respondent Number: 385 Respondent: Desmond Westlake

RepresentationReference: 385\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation (soundness): I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES this protecting this precious land.

I am pleased that the new housing numbers identified by BANES can be met by utilizing brown field sites, empty properties, allocating small housing developments around identified villages within the County and using certain redundant agricultural buildings.

This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 385\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation (soundness): Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 385\3 S

Plan Reference: Policy CP8: Green Belt

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:

Respondent Number: 386 **Respondent:** Tony Smith

RepresentationReference: 386\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 386\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 386\3 S

Plan Reference: Policy CP8: Green Belt

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(soundness): also be care taken that developers do no take advantage of the "Community Right to Build".

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 387 **Respondent:** Wendy Smith

RepresentationReference: 387\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

Page 20, Policy DW1, Para 4 - No strategic changes to the Green Belt Boundary of Bristol-Bath witin BANES this protecting this precious land.

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 387\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 387\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 388 **Respondent:** Natasha Morgan

RepresentationReference: 388\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 388\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 388\3 S

Plan Reference: Policy CP8: Green Belt

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

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

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 389 **Respondent:** Nathan Morgan

RepresentationReference: 389\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt **(soundness):** particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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This is great progress from the previously massive housing developments being thrust on this Country and I hope your Draft Core Strategy is Adopted.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 389\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 389\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 390 **Respondent:** Kim Thomas

RepresentationReference: 390\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 390\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 390\3 S

Plan Reference: Policy CP8: Green Belt

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 391 **Respondent:** M.Thomas

RepresentationReference: 391\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt
(soundness): particularlya round Whitchurch. I find it Sound and Legal for the following reasons:

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**Change sought to
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Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 391\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 391\3 S

Plan Reference: Policy CP8: Green Belt

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 392 **Respondent:** S. Jewell

RepresentationReference: 392\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly a round Whitchurch. I find it Sound and Legal for the following reasons:

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 392\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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Change sought to make legally compliant:

RepresentationReference: 392\3 S

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 393 **Respondent:** V. Perry

RepresentationReference: 393\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt
(soundness):

particularly round Whitchurch. I find it Sound and Legal for the following reasons:

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 393\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 393\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must **(soundness):** 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:

Respondent Number: 394 **Respondent:** Keith Perry

RepresentationReference: 394\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 394\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

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(soundness): small scale development only.

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Page 96, Policy RA1, Para 5.36 - It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 394\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must
(soundness): 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:

Respondent Number: 395 Respondent: P.G.Cook

RepresentationReference: 395\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt
(soundness): particularly round Whitchurch. I find it Sound and Legal for the following reasons:

Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 395\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Page 96, Policy RA1, Para 5.17 & 5.18 - I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Page 96, Policy RA1, Para 5.20 - This further enforces 5.18 as CP8 Green Belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

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Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 395\3 S

Plan Reference: Policy CP8: Green Belt

Representation Page 120, Policy CP8, Para 6.61 to 6.64 - This Policy will hopefully protect the Green Belt but there must
(soundness): 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:

Respondent Number: 397 Respondent: Stokefield Trust

RepresentationReference: 397\1

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation (soundness): The District-wide spatial strategy is now based on the Council's own assessment of growth targets based on local needs and circumstances. As a result, the Core Strategy now makes provision for around 11,000 new homes in the district for the period 2006 – 2026, down from 21,300 in the Secretary of State's Proposed Modifications to the RSS. Bath and North East Somerset Council has provided little evidence to support its revised housing figure, and it is considered that such a dramatic reduction in the number of dwellings to be provided will lead to affordability problems and social and economic issues associated with the lack of housing.

Change sought to make sound: Increase the number of dwellings to be provided in the district for the period 2006 – 2026 in line with the Secretary of State's Proposed Modifications.

Representation (legal compliance): The Core Strategy fails to take due account of the growth figures set out in the Secretary of State's Proposed Modifications to the RSS (July 2008) which, unless/until revoked by the Localism Bill, remain a material consideration in the preparation of the LDF.

Change sought to make legally compliant: Take due account of the growth figures set out in the Secretary of State's Proposed Modifications to the RSS.

RepresentationReference: 397\2

Plan Reference: Policy B1: Bath Spatial Strategy

Representation (soundness): The Council has provided little evidence to support its revised housing figure for Bath and, instead, has based its requirement on the assessed capacity of a number of brownfield sites within the Central Area and Bath's neighbourhoods. In particular, reliance is made on the redevelopment of surplus Ministry of Defence land at Foxhill, Warminster Road and, potentially, Endsleigh, the timescale for closure of which is currently unknown.

Change sought to make sound: The Council should increase the provision of housing for Bath in line with the Secretary of State's Proposed Modifications, and place less reliance on the delivery of housing from the Ministry of Defence sites. It should plan for an urban extension on the south side of the City, adjacent and to the east of the Odd Down Park and Ride to meet the needs of the City in the period to 2026, and beyond.

Representation (legal compliance): The Core Strategy fails to take due account of the growth figures set out in the Secretary of State's Proposed Modifications to the RSS (July 2008) which, unless/until revoked by the Localism Bill, remain a material consideration in the preparation of the LDF.

Change sought to make legally compliant: Take due account of the growth figures set out in the Secretary of State's Proposed Modifications to the RSS.

RepresentationReference: 397\3

Plan Reference: Diagram 10: Bath's Neighbourhoods

Representation (soundness): The designation of land to the south of Bath as a Special Area of Conservation (SAC) Focus on Diagram 10 has not been justified by the Council in the Core Strategy, and has no meaning without such

justification, and without supporting Policy Statements.

Change sought to make sound: Delete reference to SAC on diagram 10.

Representation (legal compliance): It fails to take account of the RSS which, unless/until revoked by the Localism Bill, remains a material consideration.

Change sought to make legally compliant: Take due account of RSS.

Respondent Number: 398 Respondent: Midsomer Norton Forum

RepresentationReference: 398\0

Plan Reference: Policy SV2: Midsomer Norton Town Centre Strategic Policy

Representation Whilst overall we fully support the Core Strategy we have two concerns in the detail:

- (soundness):**
- i) Our fear is that given the wording of the target to create 1000 new jobs, that this objective will be seen as inspirational rather than as a hard target which must be achieved.
 - ii) We see it as essential to put in place an Article 4 Direction relating to the Midsomer Norton and Welton conservation area. Without this MSN and Welton will risk losing their distinctive character//heritage and this is not just important historically but an economic differentiator and asset in terms of attracting footfall to the town.

Change sought to make sound: The Midsomer Norton Forum sees it as essential that the 1000 jobs is the minimum target and that we put in place measures to try and exceed this so that any that short all will mean we still hit the target.
Put in place an Article 4 Direction relating to the Midsomer Norton and Welton conservation area.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 399 Respondent: Midsomer Norton & Radstock Chamber of Commerce

RepresentationReference: 399\1

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation Whilst overall we fully support the Core Strategy our concern is that given the wording of the target to create 1000 new jobs, that this objective will be seen as inspirational rather than as a hard target which must be achieved.

Change sought to make sound: The Midsomer Norton Forum sees it as essential that the 1000 jobs is the minimum target and that we put in place measures to try and exceed this so that any that short all will mean we still hit the target.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 400 Respondent: Redfield Residents Association

RepresentationReference: 400\1

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation Whilst overall we fully support the Core Strategy we have two concerns in the detail:

- (soundness):**
- i) Our fear is that given the wording of the target to create 1000 new jobs, that this objective will be seen as inspirational rather than as a hard target which must be achieved.
 - ii) We see it as essential to put in place an Article 4 Direction relating to the Midsomer Norton and Welton conservation area. Without this MSN and Welton will risk losing their distinctive

character//heritage and this is not just important historically but an economic differentiator and asset in terms of attracting footfall to the town.

Change sought to The Midsomer Norton Forum sees it as essential that the 1000 jobs is the minimum target and that we
make sound: put in place measures to try and exceed this so that any that short all will mean we still hit the target.
Put in place an Article 4 Direction relating to the Midsomer Norton and Welton conservation area.

Representation (legal compliance):

Change sought to make legally compliant: