

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 801 to 823)

Respondent Number: 801 Respondent: A Lindley

RepresentationReference: 801\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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Representation (legal compliance):

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RepresentationReference: 801\2 S

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

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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.

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Change sought to make legally compliant:

Respondent Number: 802 Respondent: G Lindley

RepresentationReference: 802\1 S

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Respondent Number: 803 **Respondent:** Alan York

RepresentationReference: 803\1 S

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Respondent Number: 804 **Respondent:** D D Lugiewicz-York

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Respondent Number: 805 **Respondent:** A Cooper

RepresentationReference: 805\1 S

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Respondent Number: 806 **Respondent:** S Cooper

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Respondent Number: 807 **Respondent:** J Blackwell

RepresentationReference: 807\1 S

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Respondent Number: 808 **Respondent:** Susan Rosolek

RepresentationReference: 808\1 S

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Respondent Number: 809 **Respondent:** Enrico Rosolek

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Respondent Number: 810 Respondent: Paul Britten

RepresentationReference: 810\1 S

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Respondent Number: 811 Respondent: Jill Britten

RepresentationReference: 811\1 S

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Respondent Number: 812 Respondent: S Penfold

RepresentationReference: 812\1 S

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Respondent Number: 813 **Respondent:** John Lane

RepresentationReference: 813\1 S

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Respondent Number: 814 **Respondent:** Angela Lane

RepresentationReference: 814\1 S

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Respondent Number: 815 **Respondent:** Cologero Santilippo

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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: 815\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: 816 **Respondent:** Mrs Lisa Cains

RepresentationReference: 816\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation Using Brownfield sites as a priority for new housing is sound No strategic changes to the Green Belt **(soundness):** Boundary of Bristol-Bath within BANES thus 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 County and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 816\2 S

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

Representation Para 5.17, Para 5.18 and Para 5.20 I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

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.

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: 816\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 819 **Respondent:** Paulton Parish Council

RepresentationReference: 819\1

Plan Reference: Policy RA4: Rural Exception Sites

Representation Whilst this policy is not particularly relevant to Paulton as it deals with residential developments with
(soundness): 100% affordable housing clause 5.33 states "that occupancy of the development should remain for people with local connections", and it concludes, "Prioritisation of local connections will be agreed within the s.106 agreement, but adds, "and in accordance with housing letting guidance" It is my understanding that affordable/social housing occupancy is decided much as it was at the time of council housing, on a points scheme, therefore it follows that local people do not get a preference over anyone else in the district.

**Change sought to
make sound:** I am of the opinion that this requires amendment, to give those with local connections a higher priority over people from out-side the village.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 819\2 S

Plan Reference: Policy CP8: Green Belt

Representation 6.61 states, "Green Belts are designated primarily to prevent urban sprawl"

(soundness): So whilst Paulton is not within the green belt I believe that this policy is relevant in protecting the boundaries of the village and preventing connection with Hallowtrow, Midsomer Norton or Farrington Gurney.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 819\3

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation In my opinion this is an excellent document setting out quite clearly what are admirable intentions, it

(soundness): will be the policing of these policies which will alone determine the outcome, if achieved the Bath and North East Somerset of 2026 will be very attractive part of the country to live in and be part of. What this strategy document is lacking in my opinion is an earth moving solution to what is and has been for a number of years how to solve the transport and road infrastructure. With an increase of 11,00 new homes, and 8,000 new jobs the increase of the numbers on the roads does not bear thinking about, and in my opinion this strategy will not be satisfactory until this problem is resolved, bus lanes on there own are not the answer.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 819\4

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation 1 The Somer Valley is to provide 2,700 new homes of the 11,000 contained within the strategy

(soundness): document. This equates to about 24% of the total, do you not consider this figure to be too high?
2 The Polestar site in Paulton is scheduled to provide 421 new dwellings, is this number part of, or additional to the 2,700 new homes to be constructed in the Somer Valley?

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 819\5

Plan Reference: Policy CP9: Affordable Housing

Representation Affordable Housing, parts of this document appear to be contradictory, can you review the criteria for

(soundness): allocating affordable housing to benefit those who are, and have been born or have resided in a village for a number of years?

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 819\6

Plan Reference: Chapter 7: Monitoring

Representation 5 How do you plan to police and monitor the elements set out in this document?
(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 819\7

Plan Reference: Policy CP12: Centres and Retailing

Representation How do you intend to ensure that small business units and shopping outlets are occupied and not left
(soundness): empty for years, as is the current position in the centre of Paulton at present?

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 819\8

Plan Reference: Policy CP6: Environmental Quality

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 820 **Respondent:** St James’s Investments and Tesco UK Stores

RepresentationReference: 820\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation Our clients welcome the Core Strategy’s focus towards development in the main urban areas and in
(soundness): particular the desire to:

- Regenerate and repair a number of areas within the Central Area and Western Corridor
- Plan for the expansion of knowledge intensive and creative employment
- Achieve additional stock of office premises
- Provide new homes within the city
- Transform the Western Riverside area into a contemporary residential neighbourhood
- Support the development strategy for Bath with the implementation of necessary transport and

other infrastructure to improve movement, accessibility to employment and community facilities

The spatial strategy needs to focus on the positive development of redundant or underused brownfield land in order to achieve the desired economic and social regeneration of the city.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 820\2

Plan Reference: Policy B2: Central Area Strategic Policy

Representation Our clients question the specific reference to the amount of convenience shopping floorspace required (**soundness**): in this policy, given the council's acknowledged need to update their retail evidence base (paragraph 6.92).

Change sought to make sound: The policy should adopt a more flexible approach ahead of an updated retail strategy, which would enable the existing overtrading issues to be met in a number of ways.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 820\3

Plan Reference: Policy B3: Twerton and Newbridge Riverside Strategic Policy

Representation Our clients support the recognition of their site as one of two 'key regeneration opportunities' in the Twerton and Newbridge Riverside area and the desire to promote employment-led mixed-use development. The policy acknowledges the industrial past of these areas and the need to provide new employment space suitable for modern needs. New development in this area can also help the council to achieve its objectives to improve the appearance of the Lower Bristol Road, connect the riverside, reduce congestion and improve the pedestrian environment.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 820\4

Plan Reference: Policy CP12: Centres and Retailing

Representation Our clients are broadly supportive of the overarching policy objective to direct new retail provision to the existing centres and the recognition that the Bath central area must be the focus for comparison goods retail as part of the multi-functional role of the city centre. Our clients also support the recognition and the acknowledged need for further convenience goods floor space in Bath.

The Core Strategy is over reliant on the 2008 Retail Strategy to inform the amount and type of new retail floor space required during the plan period and within specific policy areas. Paragraph 6.92 of the Core Strategy acknowledges the changes in circumstances that have occurred since the strategy was produced and the need for re-assessment.

Change sought to make sound: The Core Strategy should adopt a more flexible approach to the amount and type of new retail floor space required, until an up-to-date retail strategy is in place.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 821 Respondent: Cam Valley Wildlife Group

RepresentationReference: 821\1

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

**Representation
(soundness):**

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\2

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation (soundness): We are concerned that the lack of detailed assessment for Chapter 4 has effectively ruled out proper consideration of the importance of a link between SACs via Radstock and has also ruled out the proper consideration of the impact upon SACs. Research into the matters that would have emerged upon a detailed assessment of Chapter 4 may have resulted in consideration of that Chapter under the Habitat Regulations Assessment. We are not presuming that consideration of Chapter 4 would have resulted in an assessment of a potential or actual impact on the SACs, but information that we have gathered and independent study in 2009 and 2010 suggests that this is a possibility that should have been investigated.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\3

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

Representation (soundness): Cam Valley Wildlife Group would like to be positive about the Core Strategy with reference to the conservation and enhancement of biodiversity but, unfortunately, finds itself in a difficult position in this regard.

We would like to see a strategy that embraces Government policy on wildlife and biodiversity, that takes its cues from the Biodiversity Strategy for England; we would like to see a strategy that pays full attention to the elements of Government policy on sustainability and sustainable communities; we would like to see the integration into the Strategy of the protection of the wildlife resource and the Council's duty to both conserve and to enhance biodiversity.

What we actually see is a strategy that appears to take a communities-led approach with the emphasis on the economy and on built development, and with too little attention to the crucial and important

matter of biodiversity. The Key documents are cited as the Council's "overarching strategy", the Sustainable Community Strategy, and its economic and regeneration aspirations for the main urban areas, the 'Futures' documents. The first only mentions biodiversity once, and then only as a spin-off of improvements to green infrastructure by 2026; the economic and regeneration aspirations are little concerned with biodiversity. Sustainability, and sustainable communities and economies are not the same thing, and this narrow focus acts against the conservation and enhancement of biodiversity.

The natural environment is quite rightly flagged up in the Strategy as requiring protection and enhancement, but the impression is of an emphasis on its aesthetic value.

The Spatial Vision states that B&NES' "economic, cultural and social potential will be realised whilst maintaining environmental attractiveness and unique heritage...Over the next 20 years or more the area will mature as a more beautiful and successful place where urban and rural communities flourish, health and wellbeing is improved, everyone can reach their potential and needs for materials and produce are met locally...The stunning built and natural environment will continue to provide a backdrop...." and so on.

Although the Strategy flags up a need to achieve national biodiversity targets, the very important matter of biodiversity is not brought to the fore.

At the launch of the Wildthings Partnership 10 years ago, John Everitt said, "It is important that Biodiversity becomes a key issue in everything we do, a main thread, something we want to put into everything we do."

We would like to see this positive thinking reflected in the tone and context of the plan. When the Chief Executive made these remarks, the UK was planning to reverse the decline in biodiversity by 2010. This failed, and so, anticipating this failure, the Government put in place the NERC Act, which puts a statutory duty on Local Authorities to conserve and enhance biodiversity. Biodiversity and wildlife are not the same thing, and important elements of biodiversity can be found in many places, not just what we think of as the natural environment and green infrastructure. In the overview material, biodiversity value specifically is singled out for the rural areas alone, yet some of the most 'biodiverse' sites are found in or on the edge of urban areas.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\4

Plan Reference: Policy CP7: Green Infrastructure

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\5

Plan Reference: Policy CP7: Green Infrastructure

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\6

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

Representation (soundness): We note that the Sustainability Appraisal Report for the Core Strategy pointed out that protecting habitats and biodiversity is not sufficiently covered within the vision or the Strategic Objectives and that reference should be made to the areas of particular importance for habitats, protected species and biodiversity. It goes on to state that the issue of climate change impact upon biodiversity should be included in Strategic Objective 1 and that Green Infrastructure should be referred to within the vision. We agree. Further, in order to protect habitats, Strategic Objective 2 will need to have "good habitats and important species" added to the District's wildlife sites as objects of restoration of diversity and resilience - not all important or quality habitats are located in the District's wildlife sites, and high quality sites are not always designated as wildlife sites when the council thinks it expeditious not to (the exceptionally high quality habitat on RAD1 being a perfect example, despite English Nature's request that it be designated).

The wording in para 1.12, "We will also need to ensure that the natural environment is maintained and enhanced to maximise opportunities for mitigation" could be misinterpreted, taken to mean that the purpose of the maintenance and enhancement in this case is to provide mitigation opportunities for developers. We assume that this is not the intention of the wording and suggest that clarity is promoted by replacing the word "mitigation" with the phrase, "mitigating the causes and effects of climate change." This would echo the wording in the Spatial Vision.

Making "optimum" use of brownfield sites would be good if 'optimum' embraced the aims of the

Biodiversity Strategy for England with regard to brownfield land and species, but Objective 2 qualifies optimum as meeting housing and economic development needs and as a way of avoiding using greenfield land. We fail to see how meeting housing and economic development needs is pertinent to the objective of "Protect and enhance the District's natural, built and cultural assets and provide green infrastructure", the very elements that usually are described as "constraints" to economic and housing development!

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\7

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation (soundness): The sustainability appraisal recommends that for Bath, areas of particular importance for habitats, protected species and biodiversity should be referenced, but there is no similar recommendation for the Radstock and Midsomer Norton area, in which there is an emerging picture of an extremely important biodiversity resource and potential for significant biodiversity conservation and enhancement.

Excerpts from the sustainability appraisal, paragraph 5.5:

The Somer Valley area has not been known for its wildlife so far, being viewed as relatively poor in wildlife resources. However, the stunning biodiversity of the Somer Valley area is as significant to it as Chew Valley Lake is to the rural areas and Combe Down bats to Bath. It is important to be positive about this in the Portrait, Strategic Objectives, Key Issues and Place-making Principles and to use it within the strategy as an asset of economic and social benefit.

Radstock Railway Land (RAD1) supports one of the best invertebrate sites in the South West and the best dry grassland site in B&NES on a site which extends to within the urban policy area set out in the Strategy. It is at the hub of an ecological network that supports metapopulations of threatened and vulnerable insect, acting as a supporting and feeder site for many smaller sites and even populations of rare insects on sites further away, such as at Tucking Mill and Combe Hay, linked to it through an existing ecological network peppered with former industrial features and linked by former railway lines and natural features. It supports a wealth of other animal and plant life, including UK Biodiversity Action Plan species (see below). This important hub may be lost to development, on the basis that placement of an urban block structure may act as a catalyst for regeneration, a key element of the existing spatial strategic vision for Radstock, for which the case for regeneration and economic benefit is thin at best. However, whether or not it is lost, it is important to try to conserve the remnants of important populations and to make every effort to enhance the local network in the hope that some of the rare and endangered species, as well as the more common, can be saved in the Radstock, Westfield and Midsomer Norton area and that at least some of the value of the network that will be lost can be restored. The Core Strategy has an important role to play in promoting this.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\8

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

Representation (soundness): We believe that it is time that the over-simplified “Greenfield good, Brownfield bad” message is thrown into touch. Strategically well placed greenfield sites can deliver higher affordable housing percentages and planning gain at lower environmental cost than 'biodiverse' brownfield sites of high community value. One of the strategic messages in the Core Strategy is to make the best use of previously developed land. It is vitally important that the role of previously developed land in providing urban green space and supporting brownfield biodiversity is not overlooked. There appears to be a tendency in the strategy to assume that 'best use' is synonymous with the removal of contaminated land and with urban regeneration through the creation of a safe built environment, but this is not in accordance with Government policy. Contamination within post-industrial sites can be one of the factors that slows succession and creates the special habitats that support high biodiversity value. Remediation can release those contaminants into the environment, whereas long-standing contaminated sites can hold them in pockets as long as they are not disturbed. The best use of a good brownfield site can be as a multi-functioning green space for biodiversity, leisure, culture, education, health, visitor attraction and as a 'green lung' to combat pollution.

The Core Strategy is the right place to bring together a strategic approach to the delivery of biodiversity conservation and enhancement.

The text is vital for putting the policies into context, for those who will be implementing them as well as those making a case for or against a particular development. The Portrait and Key Strategic Issues in particular set the tone and context for the whole strategy. We would like to see amendment of the wording of the document, and to see this reflected fully within the body of the plan and its policies. We are hoping to see a more positive, pragmatic and proactive approach to the conservation of the rich biodiversity and wildlife resources of the District towards 2026, not only to properly enable the council's duties under the NERC Act, to contribute to national aims and targets and to implement Government policy, but also to support the important role that wildlife and biodiversity can play in making the area an attractive place to live, work and visit.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 821\9

Plan Reference: Paragraph 1.21

Representation (soundness): In Section 1c, 1.21, the District is described as having a rich and diverse biodiversity resource, but the B&NES Rural Landscapes SPD, 2003 paints a very different picture. It describes a District in which the wildlife resource is poor, both by UK and European standards and where only 6% of the area was characterised with semi-natural habitat of high wildlife value in a study in 1990. The SPD was warning of losses of the good quality habitats that remain and of their fragility in 2003. Although no wildlife and biodiversity audit has been carried out in the District, further losses and degradation of habitats and species loss in the area since has worsened an already bad situation regarding both wildlife and biodiversity. Section 1.21 cites many protected species and habitats, and yet the only habitats mapped on the Nature Map for the area are woodland, neutral grassland and open water. These are landscape scale priority habitat areas for restoration and improvement. The important habitats and biodiversity that remain in good condition in the District are largely in small areas, often isolated pockets, but there are also some important linear features, most notably rivers, former railway lines and tramways that link directly and indirectly a network of sites and stepping stones.

Excerpt from Rural Landscapes SPD, 2003:

"5.3 At first glance it can appear that the landscape of the area is still a rich wildlife resource, comprising a tapestry of green fields, hedgerows, woodlands and river corridors. Closer inspection however reveals a very poor and fragmented distribution of good semi-natural habitats. Studies

published back in 1990 indicate that only 6% of the area is characterised with semi-natural habitat of high wildlife value. This is quite low compared with the national average and very low compared with the rest of Europe. The semi-natural habitats that do remain are typically small and are often isolated from each other. This tends to reduce their wildlife value and viability since it is harder for most species to survive and flourish in small isolated sites."

There are high quality and distinctive landscapes in the B&NES area visually, but in wildlife and biodiversity terms it is a seriously degraded landscape. Although we appreciate that the Council wants to be up-beat in its Core Strategy, it is at the expense of a realistic appraisal of both the poor state of the wildlife and biodiversity resources and the scale of the need to allocate resources to these neglected areas.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\10

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

Representation (soundness): The Wildthings initiative is the home of the B&NES Biodiversity Action Plan, but is essentially a partnership initiative that does not perform a strategic function; it has been significantly under-resourced, both in terms of officer time and finance. Although there have been some successful projects such as Batscapes, Wildthings cannot be said to have achieved its purpose and has done relatively little to adequately identify the quality of the wildlife resource of the District or to improve it significantly. There is presently no Wildthings officer.

The Wildthings initiative is the home of the B&NES Biodiversity Action Plan, but is essentially a partnership initiative that does not perform a strategic function; it has been significantly under-resourced, both in terms of officer time and finance, which goes beyond its formation. Although there have been some successful projects such as the Batscapes project, Wildthings has not achieved its purpose and has done relatively little to adequately identify the condition of the resources in the District or to improve them significantly. There is no Wildthings officer. The long-standing lack of resources has led to a situation in which there is a great deal of work to do.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\11

Plan Reference: Whole Document

Representation (soundness): Those areas over which the Authority has influence through development management have not been adequately protected through planning policy, which has effectively allowed the overriding of wildlife and biodiversity value through what appears to be a 'double take' on the existing environment policies that allows development to proceed without full mitigation or compensation. The approach to B&NES-owned land and buildings has been patchy. This appears to be a resource issue, although with more attention paid to this matter B&NES could make a much more significant contribution to protecting the wildlife and biodiversity resource under its stewardship. Whilst a handful of verges have been given some protection to protect Bath Asparagus, B&NES has failed to ensure that there is a comprehensive and robust system for the identification and protection of important species associated with its landholdings and buildings. For example, work was conducted on Victoria Hall, Radstock, which

supports several important bat roosts, including a maternity roost, yet the Department in control had no idea of the existence of the roosts, despite other departments in B&NES being closely involved with the planning of the development in question and monitoring it through Major Projects.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\12

Plan Reference: Policy CP7: Green Infrastructure

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\13

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

Representation We hope that the Council will recognise the importance of the network of post-industrial land in the
(soundness): District and its high potential to contribute to both the District's ecological network and the aim of achieving biodiversity targets in the UK. We hope that the Council will, through alterations to its policies and commitment to other mechanisms through the Core Strategy, increase the capacity of the B&NES environment to support biodiversity and to increase environmental quality regarding the wildlife and biodiversity value of the natural environment resource of the District.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\14

Plan Reference: Policy CP6: Environmental Quality

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

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

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

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

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

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

initiatives, and through liaison with Natural England and ecology experts.

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\15

Plan Reference: Chapter 7: Monitoring

Representation The monitoring and review indicators on page 136 are not adequate. The combination will not show **(soundness):** what the health of the resource is because the building for life good standard has almost no impact on conserving biodiversity; the number of conservation sites enhanced annually does not give any indication of whether the enhancement was beneficial, whether it was wildlife or people that benefited, or what quality of sites have been targeted; there is no standard which enhanced sites are required to meet; and the change in priority habitats also gives no indication of the condition that the priority habitat is to achieve or the condition over all that these habitats are meant to achieve; there is no overall indicator for the monitoring of the biodiversity resource of the District; good brownfield sites can be better biodiversity resources than many, or most, wildlife sites and are targeted for built development, and there is no indicator for the use of these sites and other habitats that may not fall into the 'priority' category to conserve and enhance biodiversity.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\16

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

Representation We hope to see the text of the Core Strategy clearly committing the Council to doing all it can to **(soundness):** reverse wildlife and biodiversity loss and to enhance its quality and quantity. We hope to see the Council sending a clear message to developers in order to prevent the share of the loss of wildlife and biodiversity that development has been allowed to cause until now. We would like to see more robust policies and objectives than those presently proposed and for the Council to send a clear message - that economic considerations have to ride alongside the protection and enhancement of the resource in an integrated way.

Cam Valley Wildlife Group is actively involved in species and habitat conservation in the Cam Valley Wildlife Group area, including through working with landowners. We welcome the opportunity to

discuss our work and to help in the identification of ways of increasing the capacity of existing networks.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\17

Plan Reference: Paragraph 1.21

Representation Paragraph 1.21 says that the Council has assessed the impact of the various policy proposals and **(soundness):** alternative options on the Environment through the sustainability appraisal, the Habitats Regulation Assessment (HRA) and locational investigations. We believe that there was insufficient information for an accurate appraisal of the impact of the Core Strategy on wildlife and biodiversity to be determined, that further information could have led to differences in that appraisal, that detailed examination of Chapter 4 could have revealed the need to undertake a Habitats Regulation Assessment for that chapter and that the process of locational examination was flawed, leading to a failure to determine the sustainability of the strategy.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\18

Plan Reference: Paragraph 1.21

Representation The Sustainability Appraisal

(soundness): The sustainability appraisal states that protecting habitats and biodiversity is not sufficiently covered within the vision or the Strategic Objectives and that reference should be made to the areas of particular importance for habitats, protected species and biodiversity. It goes on to state that the issue of climate change impact upon biodiversity should be included in Strategic Objective 1 and that Green Infrastructure should be referred to within the vision. It is disappointing that the Council has not, by this stage, deemed the protection of habitats and biodiversity important enough to adequately cover in its objectives and as a key strategic matter. Policy DW01 sets out the overarching strategy for B&NES, to promote sustainable development, but the policy applicable policy point, point, only commits to protecting the district's biodiversity resource. This does not go far enough to comply with government policy, which requires protection and enhancement. Further, point 3, to prioritise the use of brownfield opportunities for new development in order to limit the need for development on greenfield sites is not backed up by any caveat that encompasses the Biodiversity Strategy from England policy regarding the role of brownfield sites, particularly in urban areas. The 'flavour' and the substance of the text does not make the importance of the conservation and enhancement of good brownfield sites of value to wildlife and biodiversity clear either. Having said that, we note that this Draft Core Strategy has taken into account some of the matters raised by Cam Valley Wildlife Group in its response to the Launch document and are glad to see these improvements, in particular relating to networks..

Various matters remain unresolved, including the important matter of baseline data in what is meant to be a front-loading and evidence-based approach. A summary of the baseline data available is set out in the Sustainability Appraisal and it is notable that it consists merely of a list of major designated sites, recognition that there are 300 locally designated sites, and that Avon BAP priority habitat is mapped in the scoping report. There is no information regarding the state of the resources listed other

than that 71% of the SSSIs are in favourable condition, and there is no date ascribed to this evaluation or indication of how many are geological, how many biological and how the biological sites divide into types. There is mention of Wildthings (set up to work towards meeting the 2010 challenge, to which date all but one of the projects ran) and that the projects and so on can be viewed on the Council's website, but there is little within the website of much help when evaluating the state of the natural environment and biodiversity in B&NES. There is neither any other information that provides a basis for an adequate appraisal of the efficacy of the Core Strategy proposals, not even a comparative analysis of which sites are thought to be the most biodiverse sites and which sites support priority and rare species. Basically, the work required to provide adequate baseline information has still not been done, despite the representations from Cam Valley Wildlife Group and others that called for this since the earliest stage of the process. There is little or no data from previous years to draw on, for wildlife and biodiversity matters have been under-resource in B&NES since its inception, as far as we can determine. The wildlife resource of the District has largely not been managed, although WILDthings has paid attention to a few sites. We know that there has been deterioration in some of the SSSIs and SNCIs; species that they were designated for may now no longer exist at some of those sites, but there is no report to base decisions on as far as we can determine. It is difficult to see how any adequate sustainability evaluation of the proposals can be made when the information upon which to base it is largely not available.

The delivery of certain sites (as presently proposed) performs various strategic roles, set out in the Core Strategy. Losses to the biodiversity as a result of site delivery within the plan period are significant and known in some cases at least, yet the sustainability appraisal makes not mention of the impact of these losses on the biodiversity of the District. In fact there is no appraisal of this important matter at all. The strategic nature of site delivery in these cases is pertinent to the Core Strategy itself, as the strategy deals with individual strategies for various areas within the Authority; the delivery of certain sites are deemed by the Council to be key to those strategies and visions and also impact upon the housing capacity and housing distribution in the District. It seems to us to entirely logical, therefore, that associated significant biodiversity losses should be evaluated within the sustainability appraisal. For example, the Radstock site (RAD1) is central to the regeneration plans flagged up for Radstock in the Core Strategy and was given outline permission on the basis that it would kick-start regeneration and bring forward further sites for development. It is the lynch-pin for what strategic policy there is in the Core Strategy for development in Radstock and the delivery vehicle for the transport infrastructure 'improvements'/proposals for Radstock. No appraisal of its biological value and the loss of that value to the District has been made in the Strategic Housing Land Availability Appraisal on the basis that the outline permission is evidence that its use for housing land is appropriate, so the only place where the significance of the loss of the resource can be evaluated is within the sustainability appraisal. The site is the best dry grassland site in B&NES, one of the best invertebrate sites in the South West, the most biodiverse site in the Somer Valley area, and one of, if not the most biodiverse site in B&NES - one of the best wildlife sites in the District. The same lack of key site appraisal is an issue elsewhere in the District and is a both a strategic matter and a requirement of a sound approach to land use planning.

Adequate baseline data on the biological resource in B&NES could have revealed which sites are thought to be the most biodiverse sites, but even this desk-top exercise has not been performed, it seems.

We are convinced that the principle of a need to evaluate the impact upon B&NES wildlife and biodiversity of all proposals for the development of strategic sites in the District applies when determining the sustainability of the Core Strategy. We feel that the Council must address this matter with urgency.

The failure of the Council to produce the Green Infrastructure Strategy and the rather cursory identification of green infrastructure on Map 20 are also important factors determining the inability of the Sustainability appraisal to really get to grips with the issues. If the content of this strategy is not available, how is any sustainability appraisal going to be able to identify gaps in the strategy governing stewardship of the wildlife and biodiversity resource? Similarly, if no review of the impact of Wildthings

on wildlife and biodiversity in B&NES over the past 10 years is part of the baseline information for the sustainability appraisal, how can it determine what the contribution of this cited element of delivery in the Core Strategy is likely to be?

We feel that there are serious matter still to address before the sustainability of the Core Strategy with reference to wildlife and biodiversity can be determined.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\19

Plan Reference: Paragraph 1.21

Representation Habitats Regulations Assessment

(soundness): Although the assessment is considered 'fit for purpose' by Natural England, the Chapters for detailed review did not include Chapter 4, which covers the Somer Valley area within which Radstock sits. This appears to have been due to a decision by the Council that this was not required due to distance from the SACs. However, there is mounting evidence that some areas away from SACs could have a significant impact upon their long-term viability, although the complexities of bat behaviour, breeding and needs associated with genetic exchange are not fully understood.

Research into the needs of bats in the UK is still insufficient, unfortunately, and at a relatively early stage. The importance to long-term viability of populations of the connectivity of populations from different SACs, access to winter feeding areas for bats hibernating in roosts outside the SACs and access to male breeding sites has not been determined. Populations of Greater Horseshoe Bats in England are still not in recovery (note that the tentatively assumed increases are in Wales) and may still be in decline - this may also be true of Lesser Horseshoe Bat. Both species of horseshoe bat are threatened with worldwide extinction.

A radio-tracking study in 2001 commissioned by B&NES and a second 2001 study for Natural England (then English Nature) shows irrefutable evidence of greater horseshoe bat commuting between the Bath & Bradford-on Avon SAC and the Mells Valley SAC via Radstock - it is very specific about this. Although the exact location of the flight path from Radstock towards the Mells Valley SAC was not identified in 2001, further independent study suggests that it could well be via Radstock Railway Land. Independent surveys have discovered the species using the land at times of year that it was assumed by the Authority that it would not be used by this species and the site also links with the only known area where bats from both SACs have been shown to mix. There Radstock site (RAD1) is arguably the conduit for access to this site from the Bath & Bradford-on-Avon SAC. Although this is an individual site and the Core Strategy is not concerned with individual sites, it is assumed in the Strategy that the delivery of this development proposal is key to regeneration in Radstock. The delivery, or not, of this site as presently proposed will influence the capacity of the town to accommodate the housing allocation given to it in the Core Strategy and will also work against the aim to protect the wildlife and biodiversity of the District and so have significant sustainability implications.

Independent surveys in 2009 and 2010 have brought forward new information of significance regarding both greater and lesser horseshoe bat in connection with the Radstock site and the role that the Radstock area may play in ensuring the continuing viability of populations using the SACs. Due to the sensitivity of releasing information about bats and bat roosts, information on these bats and the commuting routes will be passed to the Authority's ecologist and not included in this public document.

The Radstock site (RAD1) is threatened with development and no evidence has been produced that

suggests that the section 106 requirement to mitigate the impact of light on the bat commuting route can be satisfied. The Local Authority's own investigation did not find a satisfactory solution.

Until such time as investigations can show that the Radstock site and nearby connected roosts do not have a bearing on the long-term viability of the bats using the Bath & Bradford-on-Avon and Mells Valley SACs, we suggest that a precautionary approach is necessary, in line with international obligations and UK policy.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Representation Reference: 821\20

Plan Reference: Whole Document

Representation Locational investigations.

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

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

We believe that there is support within planning guidance for a proper assessment of sites, whether or not they have an existing permission and that this should be exercised. A similar argument was made for site allocation in the B&NES Local Plan process for at least one site, which resulted in no assessment regarding the sustainability of development on that site, despite its extremely high biodiversity value in district, regional and national terms. A senior planning officer expressed surprise that the site had not been weeded out in the housing land availability study process and that the assumption had been made that the site was suitable for housing development on the basis that the site had been allocated for some time and that an outline consent had been granted in 1999; subsequently, upon examination of the Local Plan, the Inspector deemed the biological value and the community value associated with that value to outweigh the site's re-use for regeneration. We believe that there is a danger of the Authority treading in its former footsteps with regard to sites that are deemed, through extant outline permissions or former plan allocation, to be "suitable" for accommodating housing development. This, we believe is already evidenced by the way that sites are dealt with in the SHLAA. The SHLAA applies to

sites across the Authority and has a bearing on housing allocations to each area. This could make a significant difference to the strategy, especially where housing numbers attributed to individual sites are significant or the site is playing a strategic role, as is the case with RAD1. Therefore, we would like to see the Authority, as part of the appraisal of the Draft Core Strategy, undertake a review of all sites that are assumed to be suitable for development because of either an existing outline consent or because of a previous outline consent. We believe that the methodology in the SHLAA is fundamentally flawed.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\21

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation (soundness): We note that the sustainability appraisal states that Option 1 for the Radstock and Midsomer Norton area is the more environmentally sustainable option and that Option 2 is has higher economic benefit. We assume that this economic benefit is in a district context, as it is an appraisal of the sustainability of the Strategy in a District context. As there are fundamental differences in the presentation of housing numbers allocated to the various locations in the Launch document and the Draft Core Strategy, it is not that easy to apply the Options format, but it does look as if the Council has gone for Option 2 or perhaps a higher development level than Option 2 for the Somer Valley area. It appears that the Council has favoured economy over environment. As this evaluation has not been broken down into wildlife/biodiversity and other environmental impacts, it is difficult to say how much of the more negative impact of the development allocation applies to wildlife and biodiversity either in terms of direct impacts or indirect impacts. Indirect impacts include the effects of air pollution, road-kill (including insects) and increased pressure on recreational areas. More information is needed if the impact of the chosen locational strategy on the wildlife and biodiversity resource in the district can be ascertained. We suggest that the lower development level option for the Somer Valley area will have a less detrimental impact on biodiversity, given that translocations rarely work and ecological mitigation almost invariably fails to deliver a resource equal to that lost and usually results in a net loss.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 821\22

Plan Reference: Paragraph 1.21

Representation (soundness): Sufficient information needs to be provided regarding the matters about which we are concerned in order that a proper assessment of the sustainability of the Core Strategy can be made, in order that the relevance of the Somer Valley area to bat conservation and the long-term health of the SACs can be assessed and that proposals and policies for the location of development can be properly appraised and commented upon. The pertinent evaluations need to be made and elements of the strategy adjusted accordingly

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 822 Respondent: Somer Valley Friends of the Earth

RepresentationReference: 822\1

Plan Reference: Whole Document

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

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

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

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

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

RepresentationReference: 822\2

Plan Reference: Policy CP4: Distric Heating

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

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

The B&NES heat map provided in the research document shows the areas of highest heat demand, but does not show Radstock, Midsomer Norton and Paulton to be favourable; we note that a detailed map for Bath only has been provided in the Planning Research document, as Bath contains the areas of highest heat need. The number of dwellings that are planned for Radstock and the need to provide as high a level of affordable housing as possible in developments in this area acts against financial viability of a system primarily suited to large new-build development of 4,000 dwellings or more at 50 dwellings per hectare (50 dph). Higher densities are expected in the central area on the RAD1 site and on the Charltons site, but even if the Old Bakery, Post Office and Library/Youth Club/Car Park expectations were added, the numbers would still be far too small and the sites are not adjacent and include separation by a river. The design of the dwellings on RAD1 is already decided and the financial viability of that development was on a knife-edge, has not managed to secure the HCA funding required, is providing a low affordable housing component and is committed through the Section 106 agreement to provide a higher affordable component if possible. We suggest that the likelihood that further public funding could be attracted to redesign this development for utilising a District Heating System is almost non-existent. Similarly the adjacent larger sites PAU1 and PAU2 already have outline permission.

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

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

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

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 822\3

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation We note that the Equality impact assessment for the Core Strategy makes a number of **(soundness):** recommendations for improvements, but makes none with reference to Radstock. The only reference to Radstock in the assessment is that "the regeneration of the town centre includes improving the way it looks and the way it feels to be there (an improved public realm). This is an excellent opportunity for better and useful places for all".

This "excellent opportunity" has not been recognised as such by the people of Radstock itself and rejected wholeheartedly by local traders and our elected representatives, the Town Council. The most commonly encountered local perception in Radstock is that the development has been foisted upon Radstock in the face of local opposition, leading to a sense of powerlessness. There have been many years of increased housing without the jobs and facilities, controlled by B&NES planning decisions, in an environment where B&NES already freely accepted the argument that there had been an

imbalanced development model for many years before that, with far too many houses for the infrastructure, jobs and services provided. This and the long-standing pursuit of one unsuitable development proposal after another for the Railway Land site, enabled through support from B&NES, has many left people in the town feeling angry and put upon, although there is still an optimistic core of people that are hopeful of a change in direction. There is a widespread distrust of B&NES in Radstock.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 822\4

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation (soundness): The Health Impact Assessment of the Sustainable Communities Strategy looks at the wider determinants of health and points out that areas with a greater sense of trust and mutual support have better mental and physical health than socially fragmented areas with little trust. Radstock has become a socially fragmented area with little trust in B&NES. Radstock people on the whole do not trust the sentiment found in the Equality Strategy - they view the regeneration proposals as a loss of opportunity and local uniqueness; as an agent for change, not for the better, but for the worse.

We find it very interesting to note the links made in the Health Impact Assessment of the Sustainable Communities Strategy between deprivation and social factors and the issues to be addressed, including:

- environmental factors such as noise and air pollution
- opportunities for education and training
- a focus on thinking 'local'
- growth in sufficient infrastructure
- improving opportunities for deprived communities
- helping communities to influence and control issues that affect them and their area
- working in new ways to achieve better collaboration and innovation
- promoting well-being
- investing in cultural facilities in line with local interests
- encouraging physical activity
- provision of affordable appropriate transport
- promoting the community sector, a volunteer network and social enterprise

Alternatives to the present proposals for the Railway Land, for which it has still not been demonstrated that the Section 106 conditions can be met, can help address the issues flagged up in the Health impact assessment. As the existing proposals appear to be a key element of the strategy identified so far for Radstock, we firmly believe that alternatives should be assessed, which was not the case when the application for development was put in and given outline permission; the comparison was the 'do nothing' scenario.

We would welcome the opportunity to discuss how the recommendations in the Health Impact Analysis document ties in well with the re-allocation of RAD1 (a strategic site) for use as an industrial and natural history resource of high community value including high educational value and tourist potential (nature reserve, interpretation resources, educational shelter, space reserved for railway). We believe the Council has overlooked the true value of this strategic site to the community. The outline permission will soon run out and monies promised by the HCA are less than required, so we view this as an opportunity for a possible re-think on a strategic site.

We believe that the delivery of this site acts against national policy, as did the Planning Inspector who reported on the B&NES Local Plan public Inquiry, and that health and equality matters also act against its delivery. We believe that the Core Strategy implications are sufficiently significant for the re-examination of the proposal for RAD1 with reference to properly addressing the matter of health and equality in Radstock.

We do not believe the Core Strategy is sound because it has not properly assessed impacts and opportunities for Radstock in this regard.

This document includes material that was prepared for the use of Radstock Action Group by Deborah Porter. We apologise for any duplication, therefore

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 822\5

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation The Somer Valley strategy mentions the high quality natural environment in and around the town, but **(soundness):** only seeks to "protect and enhance the distinctive character of the area, including the landscape and built and historic environment". In the past 15 years, areas of high biodiversity value and habitats that can support the conservation and enhancement of biodiversity have been identified within and outside the urban areas. Although this resource could conceivably come into the category of "historic environment", it is not what springs to mind and may not be interpreted so by councillors and planners alike throughout the plan period. The identification of a Somer Valley ecological network which will encourage movement of species through the landscape and encourage the maintenance and enhancement of stable 'metapopulations' of rare species within an ecological network is a good first step. The wildlife and biodiversity of the Somer Valley area has been largely overlooked or undervalued, but has the potential to contribute very significantly to the biodiversity of the District and needs to be promoted. The area supports a range of important habitat types and the excellent biodiversity resource is supported by both acid and alkaline grasslands and by UK BAP Priority habitat, open mosaic habitat on post-industrial land.

The promotion of the conservation and enhancement of biodiversity can add interest and value to an area. It would sit very well with the energy conservation measures that the Council wants to encourage in this area, as part of an overall strategy aimed at conserving and enhancing natural resources.

The Government accepts that access to wildlife resources are beneficial to mental health and well-being. Easy and free access to quality natural environment is socially inclusive and areas of high biodiversity value are good educational tools that also offer opportunities for community involvement in promotion and management of the resource for the benefit of residents and the local economy. We believe that biodiversity conservation and enhancement should be promoted in the Somer Valley area. We believe that this complies with national policy and that not to do so is non-compliant and will result in the loss of significant biodiversity value in the District, important community resources, and the loss of a major opportunity to enhance the biodiversity of the District that cannot be equalled by enhancements in the B&NES Nature areas because of the nature of the habitats that are prioritised in those areas.

The bulk of this document was originally drawn up for use by Radstock Action Group and we apologise for any repetition, therefore.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 822\6

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation (soundness): There is a need to address both the causes and effects of climate change, which not only has impacts on the ability of future generations to meet their needs and their need for a decent environment, but also has local impacts that influence the health and well-being of the people of Radstock and their immediate environment.

Causes of climate change in Radstock are mainly in connection with out-commuting due to imbalance between homes and jobs, which is a long-standing and increasing disparity. The need to address CO2 emissions with reference to energy in the home is also significant, as it is everywhere in the District.

Plans to locate more development in central Radstock will exacerbate the problem of increased CO2 emissions unless it is designed in a way that severely limits the use of the private car by new residents in the central area. The Council flags up the area as already having congestion problems, an imbalance between jobs and housing and excessive out-commuting. It has not presented noise studies to show the present noise levels or the projected noise levels expected at the development level proposed for the Somer Valley area (Town Centre and areas elsewhere that will impact the Town centre). The sustainability appraisal says that the higher development level, which is the one that appears to be proposed, is the more environmentally damaging option, but without the baseline data, it is not possible to estimate the likely level of harm. This will be a problem in parts of the central area if the RAD1 development goes ahead as proposed, but we believe it will be worse than the developers' assessments projected as we believe that there is evidence, including in the application documents for the proposed development, that shows that indicates that the traffic level was underestimated; this development will also have a significant impact on CO2 levels and air pollution, which could easily exceed acceptable levels. The Council has provided no up-to-date air pollution data either, and the data for the RAD1 outline application is not up-to-date and is unreliable. What is clear to us is that the council is pursuing a housing growth model for the Somer Valley area that is more environmentally damaging but benefits the economy of B&NES as a whole and that acts against national policy to reduce travel, especially journeys to work by private car.

The major contribution by far to CO2 emissions is through travel to work, and we feel that the nature of the jobs market, the limited capacity for job creation in Radstock centre itself, and the impact upon noise levels, air pollution, traffic congestion and resulting town centre ambiance must be very carefully considered when making decisions about the amount and type of development that it is desirable to locate in the central area. The major populations will still be located in the settlements of the town (mostly on the hills) after any town centre residential development is completed, yet the emphasis regarding both job creation and provision of services appears to be upon the central area. This central area is very congested due to the geography of the area and the criss-crossing of several major roads, roads to the settlements and the river. Although the principle of placing housing near to jobs and services is well known, the demand for jobs created by the additional development in Radstock and the wider area will outstrip the number of jobs that the Council hopes to provide and will exacerbate the already unacceptably high level of out-commuting in the town. Therefore, we question the thinking behind this approach in this particular town. We note that the Regional Strategies (RPG 10 and the RSS) were both against development in areas like this close to major urban areas such as Bristol and Bath precisely because of the satellite effect and the resultant impact on the environment from out-commuting, looking at the principle from a wider perspective.

The need to provide homes for younger people is significant in Radstock, and the needs of older people

are clear. It is these sectors of the community that have the greatest need for easy access to public transport and to leisure/recreational facilities; younger people desperately need housing provided by social landlords in order that it is affordable for them ; families and younger people wanting to share a house can benefit from older people moving out of larger properties and into purpose-built properties that better suit their needs and that are also closer to the services and facilities they need. The central area of Radstock is close to Town Centre facilities, including tea rooms and the churches, but it is unclear how much attention has been paid to the capacity of Radstock centre to accommodate the 2-bedroom bungalows and flats that older people prefer if they are moving out of their homes. We see the impact on climate change from central residential development in Radstock as a key issue and it would be helpful if information related to the capacity of Radstock centre to accommodate a larger proportion of this sort of development (as opposed to development that will increase out-commuting to work) is needed.

The financial viability of the type of low-car development described above in the central areas is a key issue and the likelihood of completions of this type of development, with and without grants and partnership working, is a major factor when considering the capacity of central Radstock to accommodate residential development within a sustainable framework.

We do not believe that the housing growth figures for Radstock and the Somer Valley area demonstrate sound strategic policy in line with national policy.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 822\7

Plan Reference: Chapter 1: The Spatial Vision

Representation The initial paragraphs of the spatial vision set the tone and context for the whole strategy. The **(soundness):** sentiment "Its economic, cultural and social potential will be realised whilst maintaining environmental attractiveness and unique heritage" illustrates up a way of thinking that is dominated by a people-centred, economy-driven and urban-minded approach rather than the more holistic sustainable way of thinking that is necessary to secure a healthy environment for present and future generations and decrease the negative impact that climate change will inevitably have.

I would like to see a more comprehensive intent demonstrated in the first instance to make it plain that the Core Strategy does not value economy, culture and society above environmental matters and ("whilst maintaining....") and that environmental value is about more than attractiveness.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 822\8

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

Representation Attention to the district's wildlife sites and to its natural heritage does not go quite far enough. The **(soundness):** detailed points of the Objective need to include reference to biodiversity, and also more specific reference to species and habitats.

Important species will occur in the District that may be new to it, especially as the climate changes. These may not be considered to constitute part of the District's natural heritage, or indeed the natural heritage of the UK; they may not occur on the District's recognised wildlife sites, but may well need protecting nonetheless. There may also be habitats of importance in their own right that do not occur in a recognised wildlife site and also could not be considered to be part of our natural heritage, but that also need protection; there may be habitats that are not special in their own right but that, because of their particular location, support important species. The objective would benefit from some additional wording to be sure that these are covered.

Section 1d, Strategic Objective 2

Climate change is also a driver relevant to this objective; the impact of climate change on the natural heritage of the District can be tackled in part by Objective 2

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 822\9

Plan Reference: Paragraph 6.93

Representation The destination management plan is concerned with tourism in Bath, the Infrastructure delivery
(soundness): programme relies on the development of key sites to deliver transport network improvements in places like Radstock and Midsomer Norton (the proposed RAD1 development in the case of Radstock) . There is no evidence of any travel studies that could be used to inform an assessment of the environmental impact of the proposals associated with the additional travel demands, despite recognition of out-commuting and congestion as a problem. Similarly, there are no noise or air quality studies to draw upon. The Environment evidence base appears to consist of only evidence in respect of flood risk, renewable energy, waste and landscape (appearance), with the the Nature Map for the South West and the now essentially inoperative WILDthings Biodiversity Action Plan thrown in. There is more to environment than this. It is difficult to see how the environmental constraints can be understood when the baseline data is not all there.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 822\10

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation The baseline data in the Sustainability Appraisal states:
(soundness):

- The high level of self-containment in Bath and easy access to a mainline railway station does not prevent heavy traffic congestion during the day, perceived to have a negative impact on businesses in the City.
- High levels of out-commuting from Midsomer Norton and Radstock means that the link road south from Bath to Keynsham, Midsomer Norton and Radstock copes with high levels of commuter traffic.

- Norton Radstock is connected to Bath by the A367, a popular tourist route to the West Country, and to Bristol via the A362 and A37, the latter also extending south to the A303.
- Problems with congestion are experienced in Bath, Keynsham and Radstock.
- Any proposals for the further development of the area will need to address this by bringing relief from current congestion, and promoting more sustainable forms of transport.

Part of the congestion in Bath is due to out-commuting from the Radstock area; the cost of commuting by bus is high. It is difficult to see how the extant public transport provision could be improved significantly, given that it is in the hands of a commercial operator and given the relatively moderate increases in population forecast for this area. The cycle link from Radstock to Bath is a long and tortuous one that skirts around and then back in to Bath, so is of little help. Increased housing in Radstock and the surrounding area will lead to increased commuting and increased congestion in both Bath and Radstock, which both have problems with it presently. Wage statistics for Bath and the Radstock area suggest that people presently working in Bath can out-compete local people in the Radstock property market; even taking into the account the costs of public transport to work rather than the (much cheaper) car, it makes financial sense for Bath workers to move to Radstock - these new residents would be likely to have ties with Bath which would result in a higher level of travel than that undertaken by existing Radstock residents (this has been shown to be the case in studies of new developments).

Rail link option

A station in Radstock linked via the mainline directly to Bath may be possible within the plan period and could help alleviate city congestion in Bath and out-commuting from Radstock. The redevelopment of RAD1 in accordance with the outline consent will not only significantly increase out-commuting, but will also render a railway link non-viable, with the only remaining space for a rail bed being over high quality ecological mitigation land to be managed in perpetuity for biodiversity and wildlife as a condition of consent. The cost of providing a station/halt beyond the site would be prohibitive, the location too far away from the centre to promote sufficient take-up, and the opportunity for station parking would be almost non-existent without substantial and expensive highways and other works. However, the conditions of consent for RAD1 have not been satisfied; there is hope that the development will not come to pass, allowing a change of direction and reinstatement of a sustainable transport rail link in the not-too-distant future, the remaining area being mainly turned over to an industrial and natural history reserve for the educational, recreational, cultural, and economic benefit of the people of Radstock and beyond. The appraisal states that the A 367 through Radstock is a popular tourist route to the West Country. An attraction such as this to complement the award-winning Museum would allow Radstock to capitalise on this untapped source of revenue by boosting its attractiveness to visitors. There are many local historic and other features that could be brought into a local visitor trail and a small but thriving visitor-based economic sector could be developed in the area which would include visitor accommodation as part of the identified necessity to diversify the economic base.

Local park and ride

The building of a local park and ride on the Farrington side of Midsomer Norton has the potential to reduce congestion on the route to Bristol; it has the potential to provide increased frequency of bus journeys from the Midsomer Norton area to Bristol and so encourage bus use. Bus use could be further encouraged through a local (subsidised, community-run or B&NES-run) shuttle bus connecting the

various settlements to each other and to the local park and ride, which has the potential to cut down the journey time from Radstock to Bristol by bus considerably, making bus travel a more popular option. To prevent aggressive business practice threatening the viability of such a scheme, a combined park-and-ride/shuttle ticket could be purchased on the shuttle.

We believe that the Core Strategy fails to take into account properly the positive impact that a railway in Radstock and local park and ride would have on not only the Somer Valley area but also on other areas such as Bath and fails to properly implement national policy

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 823 Respondent: New Dawn Homes Ltd

RepresentationReference: 823\1

Plan Reference: Whole Document

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

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

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

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 824 Respondent: Mr Andrew Guilor

RepresentationReference: 824\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"

Yours sincerely
Andrew Guilor

Woodbine Cottage.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 825 Respondent: Tony Edwards

RepresentationReference: 825\1

Plan Reference: Paragraph 5.21

Representation Dear Sir,

(soundness): Re. Draft Core Strategy/Compton Martin Local Plan I am writing to ask the Planning Committee to reconsider the Housing Development Boundary (HDB) for Compton Martin.

As you will know the present boundary is at the western limit of our garden, which results in the orchard between us and Mendip Villias/Durnhill being outside the HDB and separating Mendip Villas/Durnhill from the main part of the village. The houses in Mendip Villas have been there for well over 60 years but have become a satellite as a result of the boundaries arbitrarily imposed in approximately 1989. This has resulted in a "them and us" situation which I am sure was not the original intention. The situation has changed drastically since 1997 when the boundaries were previously reviewed. A pavement has been completed along the A368 forming the southern boundary, and a stand of trees has been planted forming the northern boundary/The following points need to be considered.

1. A small group of houses on the site between us and Mendip Villa similar to those already existing at Mendip Villas would NOT constitute ribbon development or a "fragmented pattern of development". Such a development would help to remove the "them and us" feeling in the village. There is nowhere else in the village where a group of 40 houses is separated from the main village. I would also like to point out that planning permission was given for bungalows to be built to the West of Mendip Villas in recent years.
2. The residents of Mendip Villias/Durnhill feel cut off physically and socially from the main village.
3. In a previous ruling the "inspector" stated that any building on this site would extend the village westwards. How could this be when Mendip Villias/Durnhill and the new bungalows are already to the West of the site? The site can only be considered small, and any development as classical infilling, which to the best of my knowledge is allowed.
4. In 1987 the Village Parish Council supported a change to the HDB, and it would seem that this is a good case for "bottom up" decisions made by local people, rather than arbitrary decisions made by managers. The regulations themselves state that artificial separation of social housing from the main part of the village is undesirable, there is now a pavement connecting the satellite to the rest of the village why not complete the task by altering the village boundary?
5. This is a good site for much needed low cost housing.
6. The stand of trees planted by a neighbouring farmer will "hide" any possible development when viewed from the north.

In summary many things have changed over the past decade (or more). There is now only one dying tree left alive in the orchard, a pavement runs along its southern boundary and there is a stand of trees to the North - it has become a small area (0.33 hectares) of land with no obvious purpose indeed over the years without maintenance it could become an eyesore. I would be grateful if this letter could be carefully considered when developing the Core Strategy for

the area.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 826 Respondent: Linda Patterson

RepresentationReference: 826\1

Plan Reference: Paragraph 6.94

Representation Para 6.94 reads:

(soundness): "The B&NES highway network remains heavily trafficked highlighting the need to undertake transport and access improvements and major capital infrastructure projects to facilitate growth in housing numbers and jobs, to minimise the adverse effect of traffic, and to enable environmental improvement to be made to existing centres. The Council will continue to safeguard routes for the Whitchurch bypass and Temple Cloud/Clutton bypass and recognises the need for studies to assess the Saltford bypass and an A46/A36 link."

Not Justified:

Para 6.94 asserts that there is a "need" for the highway network to have "transport and access improvements and major capital infrastructure projects". There is nothing in the Draft Core Strategy which demonstrates a "need" for building increased road capacity, nor is there anything which shows that this would contribute to the sustainability objectives.

This approach is not the most appropriate strategy for reducing road congestion and the harmful effects of high traffic volumes (see below). It is inconsistent with other parts of the Draft Core Strategy which make clear the need to reduce car use and encourage travel by other means (e.g. paras 1.12, 6.100, Objectives 1 and 7, and elsewhere). These alternative strategies are more appropriate and more sustainable.

Not Effective:

The strategy of building more roads as a means to reduce congestion was discredited by the Government's 1994 SACTRA report, which showed that adding road capacity stimulates growth in transport - which then leads to more congestion.

The most effective way to "minimise the adverse effect of traffic" (para 6.94) is to reduce the amount of traffic. This approach is consistent with other parts of the Draft Core Strategy and local and national policy.

Not Consistent with national policy

The Department of Transport acknowledge that increased road space leads to more traffic and emissions (<http://www.publications.parliament.uk/pa/cm200506/cmselect/cmenvaud/981/981-i.pdf>, para 89, p54) Therefore, increasing road capacity is inconsistent with national targets on reducing carbon emissions.

Change sought to To make para 6.94 consistent with other parts of the Draft Core Strategy and with national targets and **make sound:** regional policies, it should be reworded as follows: (changed words are in bold.)

"The B&NES highway network remains heavily trafficked in some parts, highlighting the need to reduce the amount of traffic. To facilitate growth in housing numbers and jobs, to minimise the adverse effect of traffic, and to enable environmental improvement to be made to existing centres, development will be located where there is minimal need to travel by car, and supported by high quality transport

infrastructure which helps to increase the attractiveness of public transport, walking and cycling. as the policies in this strategy take effect, and car use reduces, congestion will diminish, as will the desire for new road construction."

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 827 **Respondent:** Norton Radstock Town Council

RepresentationReference: 827\1

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Representation (soundness): Following a meeting of the Council held on Monday 17th January 2011 where the above document was discussed, concerns were raised from both the public and Members of the Council with the lack of a Masterplan for Radstock.

The Town Council would therefore like to request either a Masterplan be concluded or a grant be given to the new Radstock Town Council to complete this work.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 828 **Respondent:** Deeley Freed (Penhalt) Ltd

RepresentationReference: 828\1

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation (soundness): Planned Growth

The Core Strategy does not explicitly set out the level of population growth for which it is planning to 2026. However, much of the infrastructure that will be required to serve new development will be based on the population growth in the area. The Core Strategy should clearly set out the anticipated growth in population for which it is planning.

Change sought to make sound: See previous section.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 828\2

Plan Reference: Policy CP2: Sustainable Construction

Representation (soundness): Policy CP2

We are generally supportive of the need for sustainable design and construction in new development.

However, Policy CP2 refers to the need for developers to address a list of specific bullet points about a building's environmental performance and requires that planning applications be accompanied by "pre-assessments". The Policy replies to ALL planning applications.

Some of the listed matters are not specifically related to land use planning and others are covered by separate areas of legislation e.g. the Building Regulations and Construction Waste Management Plans.

In addition, the policy does not consider how such matters might be dealt with in the submission of outline (rather than full) planning applications.

The Policy is overly prescriptive and will represent a significant administrative burden for developers seeking planning permission, particularly in smaller scale developments.

Change sought to make sound: See previous section.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 828\3

Plan Reference: Policy CP4: District Heating

Representation (soundness): Policy CP4

Policy CP4 requires that development within identified areas (including Central Bath) will be expected to incorporate infrastructure for district heating, and will be expected to connect to existing systems where and when this is available and includes a requirement for developers to review the proposed heating and cooling systems in development.

There are however no specific proposals for district heating systems within the identified areas and development should not be required to incorporate infrastructure for district heating in the absence of specific proposals for such systems within the identified areas.

The requirement for developers to demonstrate their approach to specific heating and cooling systems within developments appears to go beyond land use planning matters and into areas covered by the Building Regulations.

Change sought to make sound: See previous section.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 828\4

Plan Reference: Policy CP9: Affordable Housing

Representation (soundness): Policy CP9

The evidence base for the affordable housing policy is the Bath and North East Somerset Viability Study June 2010. The Study notes the importance of "residual" land values and existing or alternative use values in considering the viability of residential development incorporating affordable housing. The Core Strategy relies, particularly in Bath, on residential development coming forward on previously developed land. However, the Study does not examine the existing or alternative use values of previously developed land and the impact on the affordable housing policy and delivery.

The Study also notes that the impacts of developing new homes to higher than Code for Sustainable Homes Level 4 have not been examined. However, the Core Strategy Policy CP2 is seeking to ensure

that all new homes are developed to Code Level 6 in 2016. The CLG Cost Analysis of the Code (2008) suggests that the cost of achieving Code 6 could vary between £19k to £47k per unit. On a 40 dph scheme, costs could increase by £760k to £1.88m per hectare (although it notes that the impact of these costs could reduce by up to 25% by 2016). This could have a significant impact on viability.

The proposal to require affordable housing on smaller sites than the current policy could result in many such sites not coming forward for development, particularly as many such sites are “previously developed land”.

The policy should take into account that the development risks associated with previously developed land are often high and the required returns need to be greater to bring forward development.

The Policy should explicitly refer to abnormal costs (e.g. contamination), the requirement to achieve particular environmental standards and existing/alternative site values in considering the viability of developments, particularly as much housing within Bath is to be brought forward on previously developed land or via the conversion and redevelopment of buildings in other uses.

Change sought to make sound: See previous section.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 829 Respondent: Dorothy Cole

RepresentationReference: 829\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation Using Brownfield sites as a priority for new housing is sound

(soundness): No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES thus 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 County and I hope your Draft Core Strategy is Adopted.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 829\2 S

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

Representation Para 5.17, Para 5.18 and Para 5.20 I am pleased to see Whitchurch identified as a Focus Village with

(soundness): small scale development only.

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.

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: 829\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 830 **Respondent:** Mr Paul White

RepresentationReference: 830\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation Using Brownfield sites as a priority for new housing is sound
(soundness): No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES thus 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 County and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 830\2 S

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

Representation Para 5.17, Para 5.18 and Para 5.20 I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

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.

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: 830\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 831 **Respondent:** Mr Robert Cole

RepresentationReference: 831\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation Using Brownfield sites as a priority for new housing is sound
(soundness): No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES thus 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 County and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 831\2 S

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

Representation Para 5.17, Para 5.18 and Para 5.20 I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

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.

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: 831\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 832 **Respondent:** Mrs G House

RepresentationReference: 832\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation Using Brownfield sites as a priority for new housing is sound
(soundness): No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES thus 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 County and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 832\2 S

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

Representation Para 5.17, Para 5.18 and Para 5.20 I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

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.

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: 832\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 833 **Respondent:** Richard House

RepresentationReference: 833\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation Using Brownfield sites as a priority for new housing is sound
(soundness): No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES thus 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 County and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 833\2 S

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

Representation Para 5.17, Para 5.18 and Para 5.20 I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

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.

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: 833\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 834 **Respondent:** Mr Ryan Cains

RepresentationReference: 834\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation Using Brownfield sites as a priority for new housing is sound No strategic changes to the Green Belt
(soundness): Boundary of Bristol-Bath within BANES thus 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 County and I hope your Draft Core Strategy is Adopted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 834\2 S

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

Representation Para 5.17, Para 5.18 and Para 5.20 I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

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.

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: 834\3 S

Plan Reference: Policy CP8: Green Belt

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

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

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 835 **Respondent:** Mr Ian Becky

RepresentationReference: 835\1

Plan Reference: Paragraph 3.13

Representation fails to mention places and communities within the forms of the Localism Bill.
(soundness):

Change sought to Green Belt Policy needs to included reference to local communities in Stockwood partly (in BANES)
make sound: Whitchurch partly in BANES Brislington.

Representation (legal compliance): 3.13 needs to make refernce to separate communities between Brislington, Keynsham, Whitchurch within the Green Belt.

Change sought to make legally compliant: Local places and communities identified in the Core Strategy similar to Keynsham and Saltford.

RepresentationReference: 835\2

Plan Reference: Policy B1: Bath Spatial Strategy

Representation Need to include in B1 more detail of showcase bus routes through regeneration area to
(soundness): Twerton/Whiteway/Newbridge

Change sought to More detial of Rail Service provision in Western Riverside via Oldfield Park Station. Reference to
make sound: Showcase Bus routes on the Bath Package need improving.

Representation (legal compliance): B1.4 Greater Bristol Metro.
Protect lacks details of enhancement to Rail services to 2017 to 2020 need to include detail of Rail Services to West Wilts Bradford on Avon Trowbridge Westbury Frome. No mention offleet of the London Paddington to Bristol Railway

Change sought to make legally compliant: Include detail of Local Transport pan Detail of Rail enhancement for the West of England Partnership.

RepresentationReference: 835\3

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

Representation it fails to take account of housing need of the area and fails to take account of the need to create jobs
(soundness): especially with the loss of jobs at the Frys Somerdale factory and Somerfield HQ Whitchurch.

Change sought to develop a sustainable community including transport links on the A37 between Bristol and Wells.
make sound:

Representation (legal compliance): because it does not show economic growth around Whitchurch vilalge, Stockwood village, Brislington Hicks Gate. Whilst we welcome the Whitchurch area being a growth area and a protected village we welcome the removal of the urban sprawl but believe there should be a clearly

defined plan for Whitchurch, Stockwood and Brislington Hicks Gate.

Change sought to make legally compliant: there needs to be a more balanced and sustainable community in Whitchurch, Stockwood and Brislington Hicks Gate.

RepresentationReference: 835\4

Plan Reference: Policy B1: Bath Spatial Strategy

Representation (soundness): none of the details of the local transport plan have been shown. Detail of L EP Local Transport plan need include.

Change sought to make sound:

Representation (legal compliance): there is not enough detail of the Bath Transport Package showing the detail of the 9 showcase bus routes in the city (IDP ref Bl.1 and page 56 2.96. Not enough detail of the Greater Bristol Metro Project - no reference to Saltford, Corsham, Bradford-on-Avon, Trowbridge, Freshford, Avoncliffe, Westbury, Warminster, Frome

Change sought to make legally compliant:

RepresentationReference: 835\5

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation (soundness): because it does not show complete detail of the Greater Bristol Bus Network (GBBN)

Change sought to make sound: AS ABOVE with more details showing links to Radstock, Midsomer Norton, Wells, Shepton Mallet and Bath. Chippenham - Swindon also Bath, Bradford-on-Avon, Salisbury and Bath-Frome.

Representation (legal compliance): because Policy DW13 (16) lacks detail on the Greater Bristol Bus Network (GBBN). Whilst it says West of England authorities, First Group, DfT in the box, details of the routes are missing or lacking in detail.

Change sought to make legally compliant: proper details are required showing the Greater Bristol Bus Network (GBBN).

RepresentationReference: 835\6

Plan Reference: Strategic Objective 4: Invest in our city, town and local centres.

Representation (soundness): because it fails to address the above

Change sought to make sound: more sustainable communities need to be developed in South Bath (including regeneration sites), Keynsham, Stockwood, Whitchurch and Brislington Hicks Gate.

Representation (legal compliance): because more affordable housing needs to be allocated in the Bath (South East), Whitchurch, Keynsham, Brislington Hicks Gate areas to meet local housing need for the economic drivers of the West of England Partnership LEP.

Change sought to make legally compliant: more affordable housing needs to be allocated

RepresentationReference: 835\7

Plan Reference: Strategic Objective 7: Deliver well connected places accessible by sustainable means of transport.

Representation (soundness): It fails to identify the bus and rail network for the local enterprise partnership (LEP) and the need for transport integration to go with economic regeneration especially around Keynsham. Electrification of the rail network has not been identified between Swindon, Wootton Bassett, Corsham, Bath Spa, Oldfield Park, Saltford, Keynsham, Bristol Temple Meads and train and bus services to Frome, West Wiltshire, Freshford, Avoncliffe, Bradford-on-Avon, Trowbridge and Westbury.

Change sought to make sound: More information on the West of England Local Enterprise Partnership cross boundary local transport plan and how it integrates with the transport plans of Somerset County Council, Wiltshire County Council and Mendip District Council.

Representation (legal compliance): it fails to address cross boundary working in the Bath sub-region of the transport network into the Mendip area of Somerset and Western Wiltshire of both rail and bus services.

Change sought to make legally compliant: an improvement in the key drivers on the local transport scheme including the Bath package which SWTN support including the showcase bus routes between Bath, Keynsham and Bristol and Both Bitton and Bristol.

RepresentationReference: 835\8

Plan Reference: Paragraph 6.93

Representation (soundness):

Change sought to make sound: Policy to protect the Avon Valley Railway line from Bristol through Fishponds Staple Hill Mangotsfield Warmley Oldland Common Bitton Kelston Newbridge Weston BATH for tourist rail walking and cycling.

Representation (legal compliance): To include Policy to protection. The sustainable Rail Cycling Corridor from BATH through Weston, Newbridge to Kelston Bitton Warmley Mangotsfield Fishponds Bristol for the Avon Valley Rail protect BATH to Bristol cycling.

Change sought to make legally compliant:

RepresentationReference: 835\9

Plan Reference: Paragraph 6.93

Representation (soundness): NO finance and not in line with Sustainable Transport Policy White paper of the Coalition Government.

Change sought to make sound: Local Enterprise Partnership. Rewrite policy jointly with West of England Partnership, Greater Bristol Authority Transport Board review policy.

Representation (legal compliance): These transport road line are protected With sny money allocated in the next 10 years to carry out any of these schemes within the plan timescale.

Change sought to make legally compliant: Rewrite policy 6F in line with Government Policy Localism Bill White Paper on transport of coalition government PPG 13.

RepresentationReference: 835\10

Plan Reference: Policy B1: Bath Spatial Strategy

Representation (soundness): lack policy on regeneration District centre for Twerton Riverside new community

Change sought to make sound: alongside 3,500 affordable homes. District Centre required.

Representation (legal compliance): Lower Bristol RD
Regeneration area housing towards Twerton need District centre allocation

Change sought to make legally compliant: Allocated site for retail centre on the Western Riverside and Twerton for a District Centre

RepresentationReference: 835\11

Plan Reference: Paragraph 6.93

Representation (soundness): With the Bath package Weston Package (North Somerset) Rapid Transit line 2 in Bristol Ashton Gate to Bristol Temple Meads. North to South Rapid Transit route across Greater Bristol. Delated A36/A46 link

removed by the Highways Agency trunk ROADS England SALTford bypass is allocated.

**Change sought to
make sound:**

Representation (legal compliance): 6.93 policy support but delete 6.94 due to no funding in West of England Partnership Regional Growth Fund or any priority in the Local Transport Plans.

Change sought to make legally compliant: Delete policy of protection from plan A36/A46 link trunk routes. Saltford Bypass. Clutton Temple Cloud/Whitchurch bypass South Bristol link Keynsham Hick gate Whitchurch Hengrove. The Coalition Government policy prioritises only limited number of schemes the above schemes are not funded or being bid for, this policy causes land blighting

Respondent Number: 836 Respondent: Railway Development Group

RepresentationReference: 836\1

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

**Representation
(soundness):**

**Change sought to
make sound:** Diagram 4 needs to show the main rail corridors main bus routes ie 376 Wells-Bristol via Whitchurch. Bath-Radstock-Wells 178 * 173 Bristol Bath Railway line through Oldfield Park, Bath - Chippenham rail and bus routes and Bath-Salisbury rail and bus routes

Representation (legal compliance): Whitchurch Stockwood and Keynsham and Brislington Hicks Gate need to show Whitchurch/Stockwood/Brislington. Should be met in RA1 village. Details of Housing economic redevelopment and transport corridor. Showcase bus routes Bristol to BATH via Keynsham is shown via Bitton BATH to Wells via Radstock BATH to Bradford on Avon Trowbridge Warminster Salisbury are not shown. Rail stations at OLDFIELD PARK Keynsham Freshford Saltford New Station and Corsham are not shown.

Change sought to make legally compliant: A Policy for the area around Stockwood, (Hicks gate, Brislington) Keynsham Whitchurch which protects the character of Whitchurch village, Keynsham, Stockwood and Brislington.

RepresentationReference: 836\2

Plan Reference: Policy DW1: District Wide Spatial Strategy

**Representation
(soundness):** Fails to identify the LEP Local Enterprise Partnership Bus and Rail network and the need for Transport integration with regeneration especially Keynsham electrify railway, system of local trains between Swindon, Wootton Bassett, Chippenham, Corsham, Bath Spa, Oldfield Park, Saltford, Keynsham Bristol TM. And train and bus services to Frome Western Wiltshire Freshford Avoncliff Bradford on Avon Trowbridge Westbury

**Change sought to
make sound:** More detail of the West of England Local Enterprise Partnership, cross boundary Local Transport plans Working with Somerset and Wiltshire County Council and Mendip District Council.

Representation (legal compliance): Fails to address cross boundary working in the BATH sub region of the Transport Network into the Mendip District of Somerset and Western Wiltshire for rail and bus services.

Change sought to make legally compliant: Improvement in the key drivers on local transport scheme including the BATH Package Which we support. Including of showcase bus routes in BATH CITY area and Greater Bristol Bus Network Routes BATH Keynsham Bristol, BATH Bitton Bristol.

Respondent Number: 837 Respondent: South West Transport Network

RepresentationReference: 837\1

Plan Reference: Policy KE1: Keynsham Spatial Strategy

**Representation
(soundness):** Connection are also required to improve access to the public transport network. Reference to regeneration of the Waterfront is not included.

Change sought to K16 Make to reference to station improvements and interchange facilities 2017 2020 Greater Bristol
make sound: Metro project to Westbury via Freshford Avoncliffe Bradford on Avon Trowbridge Warminster. No reference to greater Bristol Bus Network BRISTOL to BATH A4 corridor.

Representation (legal compliance): place making principles do not include public transport facilities in Ashton Way bus terminus bus station.

Change sought to make legally compliant: Rewrite this policy to include reference to bus network stopping facilities ie bus station interchange (transport improvements) Built point (rail electrification)

RepresentationReference: 837\2

Plan Reference: Policy KE1: Keynsham Spatial Strategy

Representation I do not agree that the railway provides barrier to Somerdale Factory that can not be overcome with
(soundness): traffic signals and crossing.

Change sought to Reference to risks of development removed from the Core Strategy. This section needs rewording a
make sound: limited train service between BRISTOL and BATH. In fact train run to Weymouth/West Wilts towns Frome/London Waterloo South West Trains.

Representation (legal compliance): The reference to Risk 319 High Street G to Core Strategy to ASHTON Way Car Park should make reference to links to public transport facilities for local buses.

Change sought to make legally compliant: Reference to the ASHTON Way car park and bus interchange included in the Core Strategy.