

## Bath and North East Somerset Council Draft Core Strategy Representations by Plan Reference: Chapter 1 - Vision and District-wide Strategy

Plan Reference: Paragraph 1.05

**Reference:** 188\2 S

**Respondent:** Freshford Parish Council

**Representation** We wish to register particular, priority, support, with comment where necessary for:

**(soundness):** 2. Item 1.05. The Creation of the Placemaking Plan. Comment: top priority should be given to creation of this DPD.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 224\1

**Respondent:** Bath Preservation Trust

**Representation** BPT is not opposed to the concept of a 'Placemaking Plan' (or separate plans for the different parts of the District?). However the purpose and scope of the Plan(s) needs to be better explained. We had not seen this term used by the Planning Policy Department before the draft Core Strategy was published, and there is no reference to Placemaking Plan(s) in the current Local Development Scheme.

We understand that the intention is for the Placemaking Plan(s) to be a Development Plan Document which will replace the Site Allocations DPD which features in the current LDS. If this is correct, we welcome the intention to specify placemaking principles in the DPD. We are however very concerned that production of such a DPD is a very significant piece of work – particularly if the intention is to produce a single plan for the whole of B&NES – and work has not even started on this. We consider that ways must be found to accelerate the production of a Placemaking Plan for central Bath and the River Corridor. Without this plan, there is a huge risk that inappropriate proposals will come forward for the major development sites and the Local Planning Authority will not have the policy levers it needs to ensure that the appropriate standards of design are achieved.

**Change sought to** The LDS must set out a timescale for production of the Placemaking Plan which will ensure that it is  
**make sound:** delivered in time to influence the development of proposals for the numerous major development sites within the World Heritage Site.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 246\21

**Respondent:** Combe Hay Parish Council

**Representation** The Core Strategy would be more sound (in terms of its deliverability and effectiveness) if the  
**(soundness):** preparation of the Place-Making Plan(s) were to be pursued as soon as practicable.

**Change sought to** Pursuing the preparation of the Place-Making Plan(s) as soon as possible would greatly assist Parish  
**make sound:** Councils in their assessment of Planning Applications.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 307\1

**Respondent:** SWAN

**Representation** The document make reference to the 'Place Making Plan' but there are no further details of this plans  
**(soundness):** status, how it will be developed, who will be involved in its production. The concept is championed by

CABE who will be ceasing to exist. Under what framework and guidance will placemaking plans proceed in the future?

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

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

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

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

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

#### Plan Reference: Paragraph 1.06

**Reference:** 143\1

**Respondent:** Bathampton Parish Council

**Representation (soundness):** While the text is an accurate portrait of each sub-area inside the LPA's boundaries it could also set out the difficulty in devising planning policy for such an area – the close proximity of the World Heritage Site comprising much of the city and the areas of cherished landscape which immediately border it. The text should recognise the distinctive character of the Avon Valley east of Bath as a separate sub-region within the District and neighbouring Wiltshire. Development may involve difficult conflicts of interest and indeed conflict between CS policies which will require resolution, something which the CS should acknowledge.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 143\10

**Respondent:** Bathampton Parish Council

**Representation (soundness):** A problem of the statutory planning regime is that an LPA treats its area as an island. That is unrealistic; for example the River Avon east of Bath forms an administrative boundary yet there are planning interests common to both sides of the valley. There are similar problems of the need for cross-boundary co-operation as in the case of business development in Wiltshire only accessible to heavy goods traffic on a minor road through Batheaston. A further example is the failure to consider whether a suitable park-and-ride site east of Bath might be possible beyond the LPA boundary. The CS should acknowledge the existence of cross-boundary problems.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 162\1

**Respondent:** Batheaston Parish Council

**Representation (soundness):** While the text is an accurate portrait of each sub-area inside the LPA's boundaries it could more usefully also express the reason for the difficulty in devising planning policy for such an area – for example, the close proximity of the World Heritage Site comprising much of the major city and the areas of cherished landscape which immediately border it. We also consider the text should recognise the distinctive character of the Avon Valley east of Bath as a separate sub-region within the District and

neighbouring Wiltshire. Development may often involve possibly difficult conflicts of interest and indeed conflict between CS policies which will require resolution, the CS should not be silent on this possibility.

**Change sought to** (i) In paragraph 1.06 insert 'The high quality of much of both the townscapes and landscapes of the  
**make sound:** area will in some situations involve a conflict between policies. In such cases the LPA will have regard to the balance of advantage in the public interest when assigning appropriate weight to them'.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 257\3

**Respondent:** Valley Parishes Alliance

**Representation** The text is an accurate portrait of each subarea in the LPA boundary but it could more usefully also  
**(soundness):** express the reason for the difficulty in devising planning policy for its area – the close proximity of the World Heritage Site comprising much of Bath and the areas of protected open land which border it. The text should also recognise the distinctive character of the Avon Valley east of Bath as a separate subregion within B&NES and neighbouring Wiltshire. Development may often involve possibly difficult conflicts of interest which will require resolution. This the CS should admit.

**Change sought to** (i) In paragraph 1.06 insert: 'The high quality of much of both the townscapes and landscapes of the area  
**make sound:** will in some cases involve a conflict between policies. In such cases the LPA will have regard to the balance of advantage in the public interest when assigning appropriate weight to them'.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 1.07

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**Reference:** 102\1

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

**Representation** This presents a misleadingly positive picture. Most of B&NES is not well served from the M4/M5 or  
**(soundness):** from Bristol airport. The rail link to London from Bath is good, but very expensive, thereby discouraging modal shift, and does not conveniently link to the rest of the country. Bristol airport may be rapidly expanding for passengers but carries almost no freight, which has relevance to the region's economic growth ambitions.

**Change sought to** Soundness would be improved if there were better and more competitive transport links, eg (a) a  
**make sound:** direct bus link between Bath and the airport (which could run right through the length of the district) and (b) a rail link between Bath and a shuttle head for the airport in the Backwell area, which would avoid rush hour traffic congestion for the many who use the airport at peak hours. A study for such routes could be added to para 6.94.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 227\1

**Respondent:** London Road Area Residents Association

**Representation** Para 1.07 "well served by ..... Motorways"

**(soundness):**

BUT the i) transport links to Bristol (no longer called International by the way) Airport are mere 'country lanes' and

ii) there is no direct bus link from Bath. ( You have to go to Bristol Temple Meads – to which there is no 24 hour link from Bath).

**Change sought to** i) Include encouragement for completion of the Bristol Ring Road (A4174)  
**make sound:** ii) Presumably there will be no funding in the current economic climate for a Bath – Airport link but this could be included in the Vision for the future.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 248\1

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

**Representation** 1)RPS does not consider the ‘Spatial Portrait’ section of the CS to be a true reflection of the

**(soundness):** circumstances affecting BANES. RPS refers the Inspector to the Council’s previous version of the CS (Spatial Options, December 2009) which provided a more comprehensive assessment of BANES and its surrounding context. Paragraph 2.11 of that version of the CS states,  
“Bath and North East Somerset is part of the West of England sub region which is dominated by Bristol. Bath and North East Somerset is also surrounded by North Somerset, South Gloucestershire, West Wiltshire and Mendip. Bristol is one of the eight core cities in England and is the key driver of the south west economy, with a wide influence over the area. Bath has a complementary role to Bristol as a centre for employment and cultural and retail activity, as well as being an international tourist destination. Bath enjoys strong links to towns and villages elsewhere within the District and in the areas beyond e.g. Trowbridge and Frome.”

2)Having recognised the role of Bristol, RPS expressed concern at the time that it was not clear how the influence of the Bristol urban area had been translated into the spatial options presented. Those comments have not only been ignored, but BANES has now determined that none of the issues described above (and elsewhere) within the Spatial Options Paper are applicable.

3)The CS provides a graphical illustration of ‘the sub-regional context’ in Diagram 1. This is no more than a plan showing the BANES administrative area and has no purpose or value. It is interesting to note how Diagram 1 differs from Diagram 5 in the Spatial Options Paper, ‘Geographical relationship of Bath and North East Somerset’. That plan had a value insofar as it showed the functional relationship of BANES to the wider sub-region. It enveloped much of Bristol and clearly highlighted the functional links beyond the administrative boundary.

4)BANES has not indicated or justified in any way why those links are now longer relevant. It has to be assumed that this is the standpoint of the Council since there is no reference to the functional links whatsoever. The only reference to any influence outside of its boundary is that, ‘Bristol International Airport is one of the fastest growing regional airports in the UK’. Quite why that reference is made is anyone’s guess. For all intents and purposes this CS has no regard to any influences or challenges outside of its own administrative boundary.

**Change sought to** 1)This CS requires very significant amendment to make it sound; it cannot be found sound through ‘  
**make sound:** minor’ amendments. It requires a wholesale review with a clear mandate to address the role of the District in a sub-regional context.

2)This particular section of the CS should more adequately reflect the December 2009 Spatial Options Paper.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\1

**Respondent:** The Bath Society

**Representation** Para 1.07 “well served by ..... motorways”

**(soundness):** 1. The transport links to Bristol ( no longer called International by the way) Airport are mere ‘country lanes’ .  
2. There is no direct bus link from Bath but only to Bristol Temple Meads railway forecourt from which there is no 24 hour link from Bath.

**Change sought to** 1. Include encouragement for completion of the Bristol Ring Road (A4171)

**make sound:** 2. If there is no funding for a direct Bath – Airport link service, this could be included in the Vision for the future.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 311\2

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

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

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

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

**Change sought to** 4. Conclusions.

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

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 1.08

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**Reference:** 265\1

**Respondent:** Bath Heritage Watchdog

**Representation** In paragraph 1.08 "The city also serves as a regional shopping centre, characterised by independent (soundness): and boutique shops" is no longer true. There remain some independent shops, but the majority of Bath's retail outlets are now chains, multiples or franchises. The characteristic of Bath is now a typical southern England shopping centre with a few niche market shops, mostly outside the main centre.

**Change sought to** Either: end the sentence with a full stop after "shopping centre" and delete the remainder

**make sound:** Or: introduce a subdivision of Use Class A1 for "Independent Retail" so that change from independent retail to retail chain store is controlled by the planning system.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 1.11

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**Reference:** 162\2

**Respondent:** Batheaston Parish Council

**Representation** A problem of the statutory planning regime is that an LPA treats its area as an island. That is  
**(soundness):** unrealistic; for example the River Avon east of Bath forms an administrative boundary yet there are planning interests common to both sides of the valley. There are similar problems of need for cross-boundary co-operation as in the case of business development in Wiltshire only accessible to heavy good traffic on a minor road through a built-up area of Batheaston. A yet further example is the failure to consider whether a suitable park-and-ride site east of Bath might be possible beyond the LPA boundary. The CS should acknowledge the existence of cross-boundary problems.

**Change sought to** (ii) In paragraph 1.11 insert reference to the location in the Green Belt and Cotswolds AONB of the  
**make sound:** Avon valley immediately east of Bath.

In paragraph 1.11 add 'In the Rural Areas the Council will fully liaise with adjacent planning authorities when cross-border issues arise'.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\2

**Respondent:** Bath Preservation Trust

**Representation** We support the proposal that remaining areas of Bath not contained within the AONB, namely part of  
**(soundness):** Combe Hay Parish, Englishcombe Parish and Newton St Loe Parish, should be incorporated into the AONB.

This total area is important as part of the setting of the World Heritage Site and is of high landscape value. The fact that it is not included in the AONB may encourage developers to bring forward inappropriate development proposals.

**Change sought to** The Core Strategy should commit the Council to supporting the proposal for the extension of the AONB.  
**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 257\4

**Respondent:** Valley Parishes Alliance

**Representation** The text is an accurate portrait of each subarea in the LPA boundary but it could more usefully also  
**(soundness):** express the reason for the difficulty in devising planning policy for its area – the close proximity of the World Heritage Site comprising much of Bath and the areas of protected open land which border it. The text should also recognise the distinctive character of the Avon Valley east of Bath as a separate subregion within B&NES and neighbouring Wiltshire. Development may often involve possibly difficult conflicts of interest which will require resolution. This the CS should admit.

**Change sought to** (ii) In paragraph 1.11 insert reference to the location in the Green Belt and Cotswolds AONB of the  
**make sound:** Avon valley east and southeast of Bath.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 264\1 S

**Respondent:** Englishcombe Parish Council

**Representation** This Parish Council fully supports the proposal that remaining areas of Bath not contained within the  
**(soundness):** AONB, namely part of Combe Hay Parish, Englishcombe Parish and Newton St Loe Parish, should be incorporated into the AONB.

This total area is fully deserving of inclusion by virtue of it being 'a precious landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them'.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 278\2 S

**Respondent:** Cotswolds Conservation Board

**Representation** The Cotswolds Conservation Board notes that in paragraph 1.11 it is stated that the parish councils of  
**(soundness):** Combe Hay, Englishcombe and Newton St Loe are discussing proposals with Natural England to extend the Cotswolds AONB so that it surrounds the city of Bath.

The Board would consider carefully proposals the merits of proposals to alter the boundary of the designated area were Natural England to propose such changes following their assessment of landscape quality.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 281\2

**Respondent:** Natural England

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

Section 1b – Spatial Portrait and Key Strategic Issues

We note the reference in Paragraph 1.11 of this section to discussions with Natural England on the question of the AONB around Bath. It is important that expectations concerning the AONB are well managed and it should be noted that, with the reduction in its resources, this will not necessarily be one of Natural England's priorities.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 1.12

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**Reference:** 162\3

**Respondent:** Batheaston Parish Council

**Representation** The concepts of community and neighbourhood infuse the CS but it is not clear what these terms  
**(soundness):** mean. Is it possible, for example, for a group of villages to represent itself as a community or neighbourhood? In this context we also consider the Vision document produced by the Valley Parishes Alliance for the Kennet and Avon Canal should be treated in the same way as a Parish Plan and should be so acknowledged in the CS text.

**Change sought to make sound:** Provide definitions of locality, community, and neighbourhood in the Glossary and cross-reference them to Locality (1.12 para 5 p10).

**Representation (legal compliance):** The relevance of Parish Plans  
The CS text does not touch on Parish Plans in Locality (page 10). The concept of them emanates from DEFRA but they are not statutory, nor do they relate to the Town and Country Planning Act. Paragraph 6.2 Of PPS12 nevertheless requires LPAs to pay close

attention to their contents. In the light of that advice the text of the CS should clearly mention them and indicate what weight planning administration should accord these plans. The c Concepts of community and neighbourhood infuse the CS but it is not clear what these terms mean. Is it possible, for example, for a group of villages to represent itself as a community or neighbourhood? In this context we also consider the Vision document produced by the Valley Parishes Alliance for the Kennet and Avon Canal should be treated in the same way as a Parish Plan and should be so acknowledged in the CS text.

**3. Relevance of other Development Planning Documents**

Together with the CS the DPDs constitute the portfolio of documents which form the Local Development Framework. Provided there is no conflict of policies it is possible for a DPD, which may cover a subject of comparatively narrow and specialised interest, to be adopted before the CS. This should be made clear in section 1a of the CS to avoid public misunderstanding. Immediately before the CS coming to its public examination an up-to-date Appendix consisting of a list of the adopted and the planned schedule of further Development Planning Documents should be added to give more explicit usefulness to paragraph 1.05 of the CS.

**4. The regional background.**

The euphoria attending the withdrawal of the Regional Strategic Statement is not justified. RSSs were withdrawn following a successful legal challenge to the Secretary of State's illegal use of power. A serious problem remains as to what the government proposes to do about the cloud of housing demand which hovers over the whole country. The question of what, if any, materiality may still attach to the withdrawn RSS figures is a matter of current professional debate. It is not unlikely that by the time the RSS comes to public examination the issue of reallocating regional housing demand may return. That would necessitate a revisit to and possible reassessment of housing demand. The concept of national demand being aggregated from local proposals is inconceivable. The CS may become prey to an unresolved national issue and should give warning of this.

**Change sought to make legally compliant:** Add reference to Parish Plans in Locality (1.12 para 5 p10).

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**Reference:** 182\2

**Respondent:** Meadow View Residents Action Group

**Representation  
(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):** We consider that the Core Strategy document is not legally compliant because of the internal inconsistencies, especially between the earlier chapters on 'The Vision and Objectives' and the 'District Wide Spatial Strategy', and the later chapters on 'Climate Change', Environmental Quality and 'A prosperous economy' on the one hand and the sections devoted to the Bath, Keynsham, Somer Valley and Rural Areas' on the other. The other question is whether the Core Strategy's provisions will be consistent with the Localism Bill when it is passed, presumably before the public enquiry.

**Change sought to make legally compliant:**

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**Reference:** 227\9

**Respondent:** London Road Area Residents Association

**Representation** i) Mention of Flooding is woefully absent in the Executive Summary with only a vague mention in

**(soundness):** Section 2 and the same diagrammatic maps 4 & 5 from the main Core Strategy document which are meaningless with their dots in the river Avon and its existing floodplain.

ii) Para 6.25 - 32 on page 112 and Policy CP5 ( page 113 ) refer to B&NES SFRA and FRMS reports. The publication of the latter was significantly delayed and even now the Appendices are missing ( eg Site options maps App C & L ). How can proper comment be made ? The Flood Risk Management Strategy itself has numerous omissions eg Frank Greenhalph 1974 Flood Defence Scheme and Lewin Fryer Hydrolab 2003 report are not listed and are surely still relevant to current and future policies in explaining the purposes of the Pulteney Sluice.

**Change sought to** i) A new map showing Areas of search for Flood Storage Facilities should be included in the Flooding  
**make sound:** Section with a more accurate explanation of exactly why these are needed.

ii) All documents which the Core Strategy quotes should be available to the public in a complete form.

Eg All appendices for Flood Risk Management Strategy to be made available to the public.

iii) The Inspector to be asked that all such documents be made available in advance of an Inquiry.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 239\1

**Respondent:** Keynsham Civic Society

**Representation** Climate Change: There is no mention in the document of dealing with the effects of climate change  
**(soundness):** consideration must be given to the management of river level rises and flooding which affects out lying areas and the park.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 248\2

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

**Representation** 1)RPS notes the content of the Key Strategic Issues. RPS notes the recognition in the 'Demographic  
**(soundness):** Change' and 'Inequalities' sections that household formation is changing (and presumably increasing) and that social inequalities need to be addressed. Meeting housing need should therefore be a cornerstone objective of this CS yet the overall housing growth figure is not anywhere near enough to meet the annual housing need target prescribed by the SHMA, nevermind addressing wider market demand. It is impossible to understand how this CS will rectify those issues effectively.

2)The section on growth is 'interesting' insofar as it recognises that it needs be sustainable, and should not occur 'at all cost'. RPS does not disagree with that assertion and the issues described under this heading, ie

"BANES' wealth of natural and cultural assets, including its watercourses, trees and woodland, countryside, parks, exceptional landscapes and historic built environment, make a huge contribution towards the attractiveness and liveability of the district."

3)There is no mention of the protection of the Green Belt, which in the context of this CS is curious; seemingly this CS is founded on the basis of 'protection of Green Belt at all cost'. It is however right that the Green Belt is not referred to in the same context of the real environmental issues described above. The Green Belt is of course only a policy tool and is entirely arbitrary in terms of the quality of landscape it covers. A considerable proportion of Green Belt land is simply not valuable.

4)The section on economy disregards any notion that the BANES population and economy is in any way influenced by Bristol. It seems to suggest that the strategy to be pursued is to reduce the levels of commuting (presumably to Bristol) through more sustainable economic growth measures. This is nothing short of naïve and grossly underplays the historic and long term role Bristol's economy (and will continue to have regardless of this CS) has in BANES.

**Change sought to make sound:** 1)This CS requires very significant amendment to make it sound; it cannot be found sound through 'minor' amendments. It requires a wholesale review with a clear mandate to address the role of the District in a sub-regional context.

2)This particular section has to recognise the explicit role and influence of Bristol in the BANES context and to provide a suitable response. If that response is that BANES has no intention of having any regard to Bristol and the wider goals of the West of England Partnership, then it should at least be explicit rather than ignoring it altogether.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 257\12

**Respondent:** Valley Parishes Alliance

**Representation** Provided there is no conflict of policies it is possible for a DPD , which is likely to cover a comparatively  
**(soundness):** narrow and specialised issue, to be adopted before the CS. Immediately before the CS coming to its public examination the planned schedule of further DPDs should be updated.

**Change sought to make sound:** Provide definitions of locality, community and,neighbourhood in the Glossary and cross-reference them to Locality ( 6.12 para 5 p10).

**Representation (legal compliance):** The concept of Parish Plans emanates from DEFRA; they are not statutory and do not relate to the Town and Country planning legislation. However, paragraph 6.12 of PPS12 requires LPAs to pay close attention to their contents. In the light of that advice the CS should clearly indicate what weight should be accorded these plans, together with the Vision for the Kennet and Avon Canal document in planning administration.

**Change sought to make legally compliant:** Add reference to Parish Plans in Locality ( 6.12 para 5 p10).

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**Reference:** 265\2

**Respondent:** Bath Heritage Watchdog

**Representation** Under Climate Change it says “We will need to adopt environmentally friendly practices such as making (soundness): buildings more energy efficient...” Whilst the introduction of energy efficiency into existing buildings is sound, it does not address the biggest embodied carbon penalties which arise from demolishing an otherwise sound building in order to build something else; and that something else being constructed with the expectation of having a fairly limited life. This leads to a scenario of a World Heritage Site permanently adorned by tower cranes.

As a consequence, huge amounts of energy are devoted to manufacturing steel and concrete and shipping them long distances to a building site, only to build what can only be regarded as a temporary building with a 30-50 year life, only to have large amounts of energy devoted to demolition and reclaiming the raw materials for recycling. By contrast, the Georgian properties have already lasted more than 2 centuries and the Victorian buildings can be expected to last a similar time, so from a “whole life” viewpoint they are already more energy efficient than most recent buildings.

**Change sought to make sound:** What is needed is a planning policy that has a presumption of refusing permission to demolish a building unless what is proposed to replace it has a far greater life expectancy.

The strategic aim should be a policy of only permitting durable buildings, where durable is defined as having a life of more than a century.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Diagram 2: Sub-regional Context

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**Reference:** 264\16

**Respondent:** Englishcombe Parish Council

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

**Change sought to make sound:**

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

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

**Plan Reference:** Diagram 3: Bath and North East Somerset

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**Reference:** 246\16

**Respondent:** Combe Hay Parish Council

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

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

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Chapter 1: The Spatial Vision

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**Reference:** 50\1 S

**Respondent:** Saltford Parish Council

**Representation (soundness):** Having considered the Draft Core Strategy document, Saltford Parish Council has no comments to offer on the content.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 93\2 S

**Respondent:** Highways Agency

**Representation (soundness):** The Agency is encouraged that the Council has added text to ensure that necessary. Infrastructure is put into place in step with development, supported by the objective to reduce the need to travel.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 147\1

**Respondent:** Bath Green Party

**Representation (soundness):** The vision is critically flawed in that it does not identify a sustainable future. In the current times of potentially catastrophic climate change, the document needs to address the principle of providing for the needs of the area from within the area.

The issue of sustainability needs to be addressed in a way that it is not at the moment.

In 2005 Planning Policy Statement (PPS) 1 defines "The Government's Objectives for the Planning System" and says

"Sustainable development is the core principle underpinning planning. At the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations. A widely used definition was drawn up by the World Commission on Environment and Development in 1987: "development that meets the needs of the present without compromising the ability of future generations to meet their own needs."

The 2006 Regional Spatial Strategy (RSS) must conform with the PPS, and addresses the issue in section 1.

1 A SUSTAINABLE FUTURE FOR THE SOUTH WEST

1.6 Sustainability Principles and Policies to Guide the Spatial Strategy

A 'One Planet Economy': Sustainable Consumption and Production

1.6.2 There is a tension which the Draft RSS must help resolve, between further population and economic growth and the imperative to reduce resource consumption and, most importantly, the decoupling of growth and CO2 emissions. Consumption of natural resources or 'ecological footprint' has a global impact. Growing demands for built development, infrastructure, food, fresh water, natural

materials and energy, seriously risk the erosion of the life systems on which we all depend.

The South West's ecological footprint is unsustainable as it stands. If everyone on the planet consumed such a quantity of natural resources and energy as an average South West resident, three planets would be needed to support life on Earth. Consequently, a shift is needed towards 'one planet', lower consumption, with lifestyles which are more resource efficient. This should include a move towards locally produced, replaceable natural resources, more efficient usage of energy, better waste re-use/recycling and more efficient use of scarce natural resources such as minerals.

The "Sustainability Appraisal" for the RSS starts:

What is the purpose of Sustainability Appraisal?

1. The preparation of the South West Regional Spatial Strategy (RSS) is required by law to be subject to Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment, with the aim of achieving the goal of sustainable development.

"The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations.

This message is not new - but has been lost in this version of the Core Strategy. If the September 2009 Environ "Interim Sustainability Appraisal Report" is meant to "ensure that the Core Strategy is in accord with the objectives of sustainable development", it fails. Expectations of economic and population growth have superseded expectation of sustainability, and this must be reversed.

This clear definition of sustainability needs to be re-stated and be the main pillar of planning policy.

RA7

The options do not comment on the sustainability of the areas, which needs to be the first element to consider

.K4

The options do not comment on the sustainability of the area, which needs to be the first element to consider

**Change sought to** So to answer question DW1 – We do not agree with the spatial vision because it does not define a **make sound:** sustainable future. The top line vision should read "By 2026 the lives and lifestyles of people in B&NES will be sustainable"  
The whole Core Strategy needs to be revised to meet this objective.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 147\3

**Respondent:** Bath Green Party

**Representation** Food security

**(soundness):** On 5th January 2010, during a speech at the Oxford Farming Conference, the Right Honourable Hilary Benn said :

"... it's only in the last few decades that we have felt able to take food supply for granted, but the truth is now apparent. We cannot take it for granted any more. Food security is as important to this country's future well-being – and that of the world's – as energy security. Securing both must be our priority.

... .. We need to do three things. First, we need to produce more food. Second, we need to do it sustainably. And third we need to make sure that the food we eat safeguards our health.

... .. we also know that the consequences of the way we produce and consume much of our food are unsustainable. To our planet and to ourselves. Ours is a world where a billion people go to bed hungry

each night because they are too poor to have enough to eat, while the same number of people in rich countries are overweight or obese because they eat too much. A world where 3 billion people live on less than £1.30 a day while British households throw out nearly £33 million worth of food a day. A world where a lot of food production depends on oil and water to such an extent that we will be very vulnerable when they become either too expensive or too scarce.

Is all this sustainable? No, it isn't.

Is it just? Of course it isn't.

Is it going to be helped by governments abdicating responsibility or by leaving it just to the market to sort out? Clearly not."

There are already millions of people who do not get enough food; as changes in the climate disrupts the patterns of food production, more will go hungry. In the UK, we are largely dependent on the availability of cheap energy to grow and transport our food – as oil becomes scarcer our food supply chain will be disrupted. We must become more self-reliant in growing our own food. We must grow more food locally and organically. See:

<http://www.soilassociation.org/Whyorganic/Climatefriendlyfoodandfarming/Soilcarbon/tabid/574/Default.aspx> for a selection of links.

**Change sought to make sound:** The Core Strategy must ensure the provision of sufficient land for growing food close to the urban areas.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 154\1

**Respondent:** British Waterways

**Representation (soundness):** The spatial strategy map does not indicate the location of the Kennet & Avon Canal although it is mentioned as an asset in the text.

**Change sought to make sound:** Annotate the route of the Canal to indicate that it is separate from the river although part of the green corridor.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 180\1

**Respondent:** J S Bloor Ltd

**Representation (soundness):** The Core Strategy is considered to be unsound as it is not justified, effective and consistent with national policy. There are questions about the evidence base relying on short term trends in the economy to reduce the ability in the long term of the Council to meet housing needs. The implications of reducing the housing provision have already been acknowledged by the Council in 2009 in the Spatial Options consultation paragraph 2.29 which was based on the housing figure of 15,500 dwellings for the plan period and not that dissimilar to the First Detailed Proposals that were submitted by the Council.

"If this level of housing is not provided then it will have serious implications, preventing some people having access to a decent home, making housing less affordable (to buy or rent) and in the longer term damaging the local economy by reducing labour supply and mobility." This was the argument used by the Secretary of State, and the Panel in producing their Panel Report following the Regional EIP, that there was a need to increase the housing requirement from that set out in the Draft RSS of 15,500 to 21,300 dwellings.

In determining the local level of housing provision, PPS 3 advises in paragraph 33 that the advice from the NHPAU should be taken into account. The West of England Housing Market Assessment (June 2009) states in paragraph 11.1.8 that "Regional analyses by NHPAU indicate that the South West region is one where greater housing supply will be needed to moderate affordability pressures and meet demographic demand." There is a high level of need for affordable housing which is not being met

through existing policies and levels of delivery.

The spatial vision seeks to provide "...opportunities for all, whilst maintaining and enhancing the environmental attractiveness of the unique heritage." However, by reducing the housing provision the Council will not be providing opportunities for all – the implications for failing to meet housing supply are well known and have been set out above. Evidence of housing need from the West of England Strategic Housing Market Assessment (June 2009) is that approximately 850 dwellings per annum are required to meet those who need social rented and intermediate housing, ie those in housing need. The overwhelming message therefore is one of very high housing need, in relation both to household growth and in relation to likely total future supply.

Reducing the housing figure to 11,000 dwellings in the latest version of the Core Strategy ie 550 per annum will have a deleterious effect on the ability of people to access the housing market and moreover, on the quantum of affordable housing that it likely to be provided. The strategy emphasises the delivery of new housing on brownfield sites, however, this will fail to meet housing needs, as past experience during the Local Plan period has shown, only in four years of the Local Plan period were housing completions above that envisaged. This occurred in the early years of the plan in 1996/97, 1997/1998 and 1998/1999 and only once since in 2007/08. The shortfall in housing provision in BANES will increase commuting, as people working in parts of BANES will not be able to afford to live there. The economic strategy seems to be planning for a lower level of growth throughout the plan period rather than recognising that it should plan for more than one economic cycle. The role of the Core Strategy is to set out the long term spatial vision for BANES up to 2026 and the broad locations for new housing, jobs and other strategic development over the plan period.

The Roger Tym and Partners Report (Update June 2010) refers in the conclusions in paragraph 4.3 that if BANES Council choose to review its job growth target at this time, the report recommends that it should be done so jointly with the other local authorities in the West of England. However, what has happened in practice is that the individual Local Authorities, although aware that their neighbouring authorities are considering lower levels of growth, have not undertaken any analysis on a collective basis of the wider implications of lower levels of growth for the West of England. This is in conflict with the local authorities' collective approach set out in the Local Economic Partnership (LEP) which is based on contributing to 3.4% cumulative annual economic growth in total Gross Value Added (GVA) by 2020.

The Roger Tym work has stated that if each authority were to make its own forecasts and establish its own targets, at different times and using different approaches from its neighbours, it is very unlikely that the figures would add up to a reasonable future for the West of England as a whole. This will have implications for local economic growth and the aspirations of the LEP for the economy of the sub region.

The Strategy will be subject to plan, monitor manage so the level of development can be monitored. It is inappropriate to base the long term spatial vision on the current economic climate. If planning is based on a low growth scenario, high growth will create severe market distortions. There is a danger that the South West's historical under housing provision is exacerbated if planning figures are linked solely to a particular low "average" growth rate scenario. In turn, this tends to create higher carbon outcomes in terms of commuting and extended travel to work areas and negative social externalities related to housing affordability. Over the life of the Core Strategy it is inevitable that the economic climate will change, consequently the Core Strategy should be prepared so as to enable appropriate levels of housing provision to occur over the lifetime of the Plan and for it to be monitored accordingly.

The spatial vision does not refer to the need to support economic growth in the Bath TTWA by ensuring that sufficient housing is available in addition to that which is provided at Bath. Bath itself is constrained and relying on the redevelopment of brownfield sites which as referred to in representations on paragraphs 2.40 – 2.49. There are concerns about the deliverability given the amount of public sector investment required and that approximately 20% of the dwellings are within Flood Zones 2 and 3a.

The spatial vision for Keynsham is that it will continue to be a market town and service centre for the surrounding area. The Panel at the Regional EIP noted that as Bath was relatively constrained then Keynsham could meet the housing needs in a sustainable way. Development at Keynsham was promoted since Keynsham's location would allow for development to serve the wider needs of the conurbation. The Panel considered that Keynsham could provide a wide range of community services for the new development and that it would also be an attractive location for associated employment development (paragraph 4.1.65 of the Panel Report). Keynsham is well related to the A4 and the railway line to Bristol. The Panel considered that there was sufficient scope for development around Keynsham to allow for development to proceed without threatening the integrity of the separation of Keynsham and Bristol by the Green Belt. The Panel proposed a total of 3,000 dwellings at this location. Para 4.1.65 of the Panel Report December 2007 out of 18,800 dwellings in total for BANES.

The Panel also concluded paragraph 4.0.32 that the scale of demand and the application of the principles of Sustainable Future for the South West as set out Policies SD 1- 4 provide the exceptional circumstances to justify alterations to the Green Belts within the region. The spatial vision for BANES should reflect the need to make provision for at least 18,500 dwellings in BANES during the plan period and also to accommodate development at Keynsham.

**Change sought to** 7b Change required to make the Core Strategy sound:

**make sound:** The spatial vision for BANES should be revised to reflect the need to provide for additional dwellings in accordance with the latest 2008 based household projections and evidence of housing need. The spatial vision for Keynsham in particular should be amended to include the opportunities for development at south west Keynsham.

**Representation (legal compliance):** 6a Why you consider the Core Strategy is not legally compliant:

The Core Strategy is not legally compliant as it is not consistent with the development plan. PPS12 paragraph 4.50 states that under the Planning and Compulsory Purchase Act 2004 S 20 (5) (a) an Inspector is charged with firstly checking whether the Core Strategy has complied with legislation. It is considered that for two reasons the Core Strategy is not legally compliant as it is not in general conformity with the development plan (i.e. the RS has now be re-instated as part of the development plan and will remain so until the Localism Bill is enacted – this is envisaged to be late in 2011) and secondly as it fails to take account of national policy in terms of PPS 3 paragraph 33, the Governments latest published household projections ( 2008 based published in Nov 2010) and evidence of current and future housing need as stated in the West of England Housing Market Assessment June 2009.

**Change sought to make legally compliant:** 7a Change required to make the Core Strategy legally compliant:

In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections and take into account evidence of housing need.

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

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**Reference:** 245\1 S

**Respondent:** Environment Agency

**Representation** Spatial Vision

**(soundness):** We support the inclusion of the need to adapt to the unavoidable effects of climate change. We would agree that new development should be located in the most sustainable locations taking into account their vulnerability to the effects of climate change, such as flooding.

**Change sought to** N/A

**make sound:**

**Representation (legal compliance):**

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

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**Reference:** 248\3

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

**Representation** 1)The December 2009 Spatial Options Paper referenced the vision for the West of England: "One of

**(soundness):** Europe's fastest growing and most prosperous sub regions which has closed the gap between

disadvantaged and other communities....”

2)The Vision goes onto to confirm that, “The West of England is the hub of the South West. Bristol as the regional capital and a core city successfully represents the interests of the region, drives its economy and provides international access through Bristol International Airport and the Seaport.”

3)The CS now makes no reference to the above. Instead the CS Vision for BANES is to, “become a more competitive area within the West of England.” Seemingly it has no regard to the objectives of the wider sub-region; rather than seeking to adhere to the West of England vision, is content merely to focus on its own aims and objectives, and to compete with neighbouring authorities. It is worth considering item 1 of the West of England Constitution (of which BANES is of course a member), “Realise the potential of the West of England and improvements in its economy, public infrastructure, environment and quality of life for all its residents.”

4)It is perfectly clear that this is an environmentally-led vision. Whilst there is nothing to say that isn’t a sound approach in its own right, it cannot be ‘at all cost’ anymore than achieving strategic levels of growth can be. There is a compromise that this vision fails to achieve. This vision has no intention of meeting long term economic and housing growth objectives to the benefit of existing households, future households, and those in the wider West of England sub-region. It lacks any ambition and fails to acknowledge a world outside its own boundary. There is no reference to meeting, or even seeking to meet housing and economic needs in this vision; it is a vision with an underlying message for doing and achieving nothing if read in conjunction with Policy DW1.

5)In terms of the strategic objectives, RPS does not object to the broad content, but notes some subtle but no less critical changes from the December 2009 Spatial Options Paper.

6)In meeting the headline objective of tackling the causes and effects of climate change, the CS suggests that the Council will achieve closer alignment of homes, jobs and infrastructure. In a broad sense, the Council is proposing a strategy of dispersal that fundamentally conflicts with the objective to locate new homes close to where people work. It is clear from the evidence available that the SSCTs of Bristol and Bath represent the main employment base for the sub-region. It is precisely that reason why the West of England Housing Market Area was extended into Mendip and West Wiltshire to properly address the wide catchment of these two main centres. There is no sense in providing more homes than jobs in the Somer Valley when there are already large levels of out-commuting. The role of Bristol is completely ignored in this CS.

7)Similarly, objective 7 suggests that development will be focused in locations that reduce the need to travel. There can be no better public transport provision than that which serves the two principal SSCTs. Keynsham, on the principal A4 corridor between Bristol and Bath is equally well served. It cannot be right that significant dispersal to outlying towns such as Midsomer Norton and Radstock and other rural villages achieves those objectives in the truest sense. By choosing to largely ignore the strategic direction provided by the RS, the Council has presented a uniquely unsustainable strategy for growth.

8)In seeking to meet housing need objectives the Sustainability Appraisal makes clear that the development of the strategic urban extensions is the most appropriate means of ensuring maximum provision of affordable housing for those who need it. There is a very clear and high need for affordable housing provision, yet the Council has sought a strategy of dispersal that will not result in equivalent levels of affordable housing being provided. By the same token, it is not clear why the Council has chosen to provide a strategic requirement of 11,000 homes when even the 15,500 homes previously consulted upon was clearly insufficient to meet the short, medium and long term requirements of the Housing Needs Register. It is disappointing that the Council should take such a negative approach to a development and cannot understand the benefits that it can bring. Protection of the environment at all costs, not meeting the needs of the population is the overriding message of this CS. It is regrettable that the Council cannot see beyond that and appreciate that there are truly sustainable locations for growth that can meet the needs of its households in a strategic sense, without impacting adversely on the environment.

9)It is notable that strategic objective to improve access and reduce traffic congestion has disappeared, presumably on the basis that BANES recognises that its strategy cannot possibly help to contribute to facilitating more sustainable means of travel. There is no prospect of a strategy of dispersal providing new and improved routes for public transport, and as a consequence reducing the need and desire to travel by car. Small scale developments on the edge of rural villages cannot begin to make the necessary contributions that will provide better public transport and offset the adverse impacts of



development in such locations.

**Change sought to make sound:** 1) This CS requires very significant amendment to make it sound; it cannot be found sound through 'minor' amendments. It requires a wholesale review with a clear mandate to address the role of the District in a sub-regional context.

2) This particular section has to recognise the explicit role and influence of Bristol in the BANES context and to provide a suitable response. The vision and objectives have to recognise the needs and aspirations of the current and future people and business that live and work in BANES and not just the overriding need to protect the environment. Moreover, it has to recognise that there is a world outside of its administrative boundary that it has to respect and where practicable, provide for; BANES has a moral obligation to do so.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 252\2 S

**Respondent:** Cadbury Kraft Foods

**Representation** Spatial Vision and Objectives

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

Objective 2: 'Protect and enhance the District's natural, built and cultural assets and provide green infrastructure' seeks to ensure amongst other things to optimise the use of brownfield opportunities in meeting housing and economic development needs and avoiding greenfield land as far as possible.

We welcome BANES' proposed spatial vision and strategic objectives over the Plan Period and support the focus of growth in sustainable locations, such as Keynsham.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\33

**Respondent:** The Bath Society

**Representation** Vision & spatial strategy for the City 2b

**(soundness):** The fact that this 'vision' is now more concisely expressed is probably realistic now that options and opportunities for change have been essayed and tested in more detail since the Core Strategy production process began. On the process issue however, whilst we fully appreciate the need for adequate consultation and for a sound 'evidence base', we are concerned that more than three years has elapsed since the publication of the 'Core Strategy Issues Report' for consultation (September 2007)

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\34

**Respondent:** The Bath Society

**Representation** 2c The Central Area & Western Corridor ( pp.36-47)

**(soundness):** We note that a 'Placemaking Plan' is to be prepared to 'set out a more detailed planning and design framework for specific sites'( para 2.15). Will this have DPD status and will there be public consultation on this ? We strongly support measures to enhance riverside access and habitat. Different areas of the riverside in Bath are indeed 'poorly connected' and the state of the riverside towpath and adjacent public areas downstream of Churchill Bridge is a disgrace and a further example of poor public realm management, In this connection, we fully endorse what is said ( later on page 47) about the risks to the Newbridge and Twerton Riversides.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\35 S

**Respondent:** The Bath Society

**Representation** Western Riverside ( page 44)

**(soundness):** We support the general planning principles, as they have existed now for sometime, for this critically important development area, but we remain concerned about the emerging building designs.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 275\3

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

**Representation** The Core Strategy is considered to be unsound as it is not justified, effective and consistent with

**(soundness):** national policy. There are questions about the evidence base relying on short term trends in the economy to reduce the ability in the long term of the council to meet housing needs. The implications of reducing the housing provision have already been acknowledged by the Council in 2009 in the Bath and North East Somerset's Core Strategy – Publication Stage Representation Form Spatial Options consultation paragraph 2.29 which was based in the housing figure of 15,500 dwellings for the plan period and not that dissimilar to the First Detailed Proposals that were submitted by the Council.

"If this level of housing is not provided then it will have serious implications, preventing some people having access to a decent home, making housing less affordable ( to buy or rent) and in the longer term damaging the local economy by reducing labour supply and mobility." This was the argument used by the Secretary of State, and the Panel in producing their Panel Report following the Regional EIP, that there was a need to increase the housing requirement from that set out in the Draft RSS of 15,500 to 21,300 dwellings.

In determining the local level of housing provision, PPS 3 advises in paragraph 33 that the advice from the NHPAU should be taken into account. The West of England Housing Market Assessment ( June 2009) states in paragraph 11.1.8 that "Regional analyses by NHPAU indicate that the South West region is one where greater housing supply will be needed to moderate affordability pressures and meet demographic demand." There is a high level of need for affordable housing which is not being met through existing policies and levels of delivery.

The spatial vision seeks to provide "...opportunities for all, whilst maintaining and enhancing the environmental attractiveness of the unique heritage." However, by reducing the housing provision the Council will not be providing opportunities for all – the implications for failing to meet housing supply are well known and have been set out above. Evidence of housing need from the West of England Strategic Housing Market Assessment (June 2009) is that approximately 850 dwellings per annum are

required in BANES to meet those in need of social rented and intermediate housing. The overwhelming message therefore is one of very high housing need, in relation both to household growth and in relation to likely total future supply.

Reducing the housing figure to 11,000 dwellings in the latest version of the Core Strategy will have a deleterious effect on the ability of people to access the housing market and moreover, on the quantum of affordable housing that it likely to be provided. The strategy emphasises the delivery of new housing on brownfield sites, however, this will fail to meet housing needs, as past experience during the Local Plan period has shown only in four years of the Local Plan period were housing completions above that envisaged.

The shortfall in housing provision in BANES will increase commuting, as people working in parts of BANES will not be able to afford to live there. The economic strategy seems to be planning for lower level of growth throughout the plan period rather than recognising that it should plan for more than one economic cycle. The role of the Core Strategy is to set out the long term spatial vision for BANES up to 2026 and the broad locations for new housing, jobs and other strategic development over the plan period.

The Roger Tym and Partners Report (Update June 2010) refers in the conclusions paragraph 4.3 that if BANES Council choose to review its job growth target at this time then it recommends that it should be done so jointly with the other local authorities in the West of England. However, what has happened in practice is that the individual Local Authorities, although aware that their neighbouring authorities are considering lower levels of growth have not undertaken analysis on a collective basis of the wider implications of lower levels of growth for the West of England. This is in conflict with the local authorities' collective approach set out in the Local Economic Partnership (LEP) which is based on contributing to 3.4% cumulative annual economic growth in total GVA by 2020.

The Roger Tym work has stated that if each authority were to make its own forecasts and establish its own targets, at different times and using different approaches from its neighbours, it is very unlikely that the figures would add up to a reasonable future for the West of England as a whole. This will have implications for local economic growth and the aspirations of the LEP for the economy of the sub Bath and North East Somerset's Core Strategy – Publication Stage Representation Form region.

The Strategy will be subject to plan, monitor manage so the level of development can be monitored. It is inappropriate to base the long term spatial vision on the current economic climate. If planning is based on a low growth scenario, high growth will create severe market distortions.

There is a danger that the South West's historical under housing provision is exacerbated if planning figures are linked solely to a particular low "average" growth rate scenario. In turn, this tends to create higher carbon outcomes in terms of commuting and extended travel to work areas.

Over the life of the Core Strategy it is inevitable that the economic climate will change, consequently the Core Strategy should be prepared so as to enable appropriate levels of housing provision to occur over the lifetime of the Plan and for it to be monitored accordingly.

The spatial vision does not refer to the need to support economic growth in the Bath TTWA by ensuring that sufficient housing is available in addition to that which is provided at Bath. Bath itself is constrained and relying on the redevelopment of brownfield sites which as referred to in representations on paragraphs 2.40 – 2.49 there are concerns about the deliverability especially given the amount of public sector investment required and the fact that approximately 20% of the dwellings are within Flood Zones 2 and 3a.

The spatial vision for Keynsham is that it will continue to be a market town and service centre for the surrounding area. The Panel at the Regional EIP noted that as Bath was relatively constrained then Keynsham could meet the housing needs in a sustainable way. Development at Keynsham was promoted since Keynsham's location would allow for development to serve the wider needs of the

conurbation. The Panel considered that Keynsham could provide a wide range of community services for the new development and that it would also be an attractive location for associated employment development ( paragraph 4.1.65 of the Panel Report). Keynsham is well related to the A4 and the railway line to Bristol. The Panel considered that there was sufficient scope for development around Keynsham to allow for development to proceed without threatening the integrity of the separation of Keynsham and Bristol by the Green Belt. The Panel proposed a total of 3,000 dwellings at this location. Para 4.1.65 of the Panel Report December 2007.

The Panel also concluded paragraph 4.0.32 that the scale of demand and the application of the principles of Sustainable Future for the South West as set out Policies SD 1- 4 provide the exceptional circumstances to justify alterations to the Green Belts within the region. The spatial vision for BANES should reflect the need to make provision for at least 18,500 dwellings in BANES during the plan period and also to accommodate development at Keynsham.

**Change sought to make sound:** The spatial vision for BANES should be revised to reflect the need to provide for additional dwellings in accordance with the latest 2008 based household projections. The spatial vision for Keynsham in particular should be amended to include the opportunities for development at south west Keynsham.

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not consistent with the development plan. PPS12 paragraph 4.50 states that under the Planning and Compulsory Purchase Act 2004 S 20 (5) (a) an Inspector is charged with firstly checking whether the Core Strategy has complied with legislation. It is considered that for two reasons the Core Strategy is not legally compliant as it is not in generally conformity with the development plan (i.e. the RS has now be re-instated as part of the development plan and will remain so until the Localism Bill is enacted – this is envisaged to be late in 2011) and secondly as it fails to take account of national policy in terms of PPS 3 paragraph 33, the Governments latest published household projections ( 2008 based published in Nov 2010) and evidence of current and future need as stated in the West of England Housing Market Assessment June 2009.

**Change sought to make legally compliant:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections. The housing figures for the plan period should be increased to at least 18,500 dwellings and greater co-ordination required with Bristol Council to make sure its needs are properly met.

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**Reference:** 279\1

**Respondent:** English Heritage

**Representation (soundness):** Bath and North East Somerset Council Draft Core Strategy Publication Version

Thank you for providing the opportunity to comment on the latest version of emerging Core Strategy.

English Heritage broadly welcomes the emerging Core Strategy's aspirations for the district's historic environment expressed within the Vision and Objectives and note the proposed sustainable pattern of growth responsive to the districts environmental capacity and the significance of its heritage assets.

**Change sought to make sound:** We do however consider that further adjustments should be considered to ensure an effective strategy for the conservation and enjoyment of the historic environment and in so doing, a robust, successful and sound development plan document in accordance within national planning policy, particularly PPS5 Planning for the Historic Environment, March 2010 and its associated practice guide.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 280\1 S

**Respondent:** Scott Brownrigg

**Representation (soundness):** Comments by Scott Brownrigg in respect of Bath, comments submitted 3 February 2011

1C Spatial Vision and Strategic Objectives, page 14

We support the emphasis on improving Bath's environmental quality through the realisation of a range of development opportunities within the Central Area, in order to improve the City's environment and

design aspirations and enable Bath to position itself as a more business friendly place. We also support the delivery of new housing on brownfield sites to help to create a more sustainable relationship between the City's labour and job markets and support Bath's economic potential whilst retaining the integrity of its landscape.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 297\3

**Respondent:** Bath Rugby Club

**Representation** Page 32, The Vision

**(soundness):** We consider the "vision" could be enhanced by Incorporating a recognition that to achieve the change sought by the "vision" parts of the city 's appearance will need to change and evolve. Whilst it is Important to protect the assets that make Bath a World Heritage site there should be an explicit recognilion that this does not preclude new development, change and evolution , This Is reflective of what Is already Included In paragraph 21.5 regarding the development of Placemakng Plan.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 300\3

**Respondent:** Somer Housing

**Representation** 1c – Spatial Vision and Strategic Objectives

**(soundness):** 2.1 We welcome the inclusion of the strategic objective of 'Meeting Housing Needs' and are pleased to note that the Council acknowledges the need to provide more housing of all types to address demand. Currently the objective states that the Council will enable 'the delivery of new homes needed to respond to expected demographic and social changes and to support the labour supply'.

2.2 We support this objective, but consider that it is not achievable with the proposed housing target of 11,000 new dwellings. Our reasoning for this is explained in the next section. Given that projected household growth for the District over the plan period is around 14,000 new households(2008 CLG projections) then it is clear that this goal will not be achieved.

2.7 We are concerned that the proposed housing supply will not allow these aims to be achieved. Worsening housing affordability may make it difficult for local businesses to grow and attract the best employees and new businesses may be dissuaded from locating in BANES because of high house prices. Furthermore the economic growth projections for BANES are pessimistic and could become a self-fulfilling prophecy.

**Change sought to  
make sound:** .3 As part of an increased housing provision (recommended in later sections), we would like to see an additional sub-section to be inserted which states that the Council will aim to:  
'stabilise housing affordability in the district'

2.4 We also consider that the Spatial Vision should be amended to state that: 'In Bath and North East Somerset, sufficient housing will be provided overall to ameliorate the acute housing affordability problems in the District's housing market.'

2.5 If the Council is not prepared to increase the housing target then the objectives must be amended as the proposed housing target does not provide the housing needed to 'respond to demographic and social changes'.

2.6 We strongly support the Council's objective of encouraging economic development, diversification and prosperity. This aims to 'stimulate a more productive, competitive and diversified economy across the district where indigenous companies are retained and able to grow, other knowledge based sectors are attracted to the area....'.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 301\1

**Respondent:** South West RP Planning Consortium

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

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

1c Spatial Vision and Strategic Objectives

Spatial Vision

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

Strategic Objectives

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

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 822\7

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

**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:**

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

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**Reference:** 93\4 S

**Respondent:** Highways Agency

**Representation** The Agency is encouraged with the Council's aim to reduce the need to travel to reduce the impacts of  
**(soundness):** climate change.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 95\1

**Respondent:** The Coal Authority

**Representation** The Coal Authority considers that Objective 1 does not fully reflect the national policy requirement not  
**(soundness):** only to make prudent use of mineral resources but also to safeguard them from sterilisation.

**Change sought to** The Coal Authority would therefore suggest the following additional text to the 6th bullet point:  
**make sound:** • “facilitating the prudent use and reduced consumption of key natural resources such as undeveloped land, energy, water and minerals, along with the safeguarding of mineral resources from unnecessary sterilisation”  
Reason – To comply with the guidance in MPS1 (Planning and Minerals)

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 147\2

**Respondent:** Bath Green Party

**Representation** Peak oil

**(soundness):** The Core Strategy looks to the long term and in the long term we will live in a world where oil is scarce and very expensive. Concern about declining supplies of oil and an increasing demand for oil has been increasing, as evidenced by numerous reports since the 2006 RSS and 2007 PPS1.

See:

From 2008 “Preparing for Peak Oil - Local Authorities and the Energy Crisis” at [http://www.odac-info.org/sites/default/files/Preparing\\_for\\_Peak\\_Oil\\_0.pdf](http://www.odac-info.org/sites/default/files/Preparing_for_Peak_Oil_0.pdf)

“The Oil Crunch - Securing the UK’s energy future.” UK Industry Taskforce on Peak Oil & Energy Security (ITPOES) <http://peakoiltaskforce.net/>

In 2009 – “Building a positive future for Bristol after Peak Oil” [http://www.bristol.gov.uk/ccm/cms-service/stream/asset/?asset\\_id=32277111](http://www.bristol.gov.uk/ccm/cms-service/stream/asset/?asset_id=32277111)

**Change sought to** BANES must publish its analysis of the risks around Peak Oil and include solutions to mitigate the risks  
**make sound:** in the Core Strategy.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 152\2 S

**Respondent:** Corston Parish Council

**Representation** Corston Parish Council fully supports Objective 1 and 2 as proposed.  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 245\11 S

**Respondent:** Environment Agency

**Representation Objective 1**

**(soundness):** We are pleased to see that objective 1 has made reference to shaping places to minimise vulnerability and provide resilience to the impacts arising from climate change including increased flood risk. We consider this to be consistent with national policy, in terms of seeking in the first instance to avoid flood risk, only looking to mitigation where it is not possible for new development to be located outside of the floodplain.

We also support the inclusion of the need to reduce the consumption of key natural resources, such as water. The need for new development to incorporate water efficiency measures is important. A number of areas in the Catchment Abstraction Management Plan are classed as 'no water available' or 'over licensed'. With the effects of climate change, and the need to maintain river flows, there is a risk extra water will not be available to meet demand.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 281\3 S

**Respondent:** Natural England

**Representation** While we do not consider it necessary to return any completed representation forms there is one

**(soundness):** further aspect of the Publication Version that we suggest could be improved and others we believe that are particularly worthy of praise. In hopes that this will be of interest to the authority we would, therefore, like to offer the following informal observations:

Spatial Vision and Strategic Objectives

We welcome Objective 1 and the aim of pursuing a low carbon and sustainable future. In particular, we are pleased to see that this objective includes reference to the important contribution which multi-functional Green Infrastructure can make to climate change adaptation.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 311\1 S

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

**Representation 2.** Carbon emissions associated with Bristol Airport

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

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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

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**Reference:** 23\2



**Respondent:** Avon Wildlife Trust

**Representation** The Trust feels that this objective is missing important information regarding the potential value of **(soundness):** brownfield sites for wildlife and is therefore not as effective as it should be.

**Change sought to** Include within the objective point

**make sound:** • "making optimum use of brownfield opportunities in meeting housing and economic development needs and avoiding greenfield land as far as possible"

the statement; 'whilst ensuring brownfield sites are given the same consideration in ecological terms as Green Belt sites due to the potential importance they can have for wildlife'.

This means they should be considered for ecological surveys before development can take place.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 73\6 S

**Respondent:** Newton St Loe Conservation Group

**Representation** Specifically we find sound and support: Objective 2 - making optimum use of brownfield opportunities **(soundness):** in meeting housing and economic development needs and avoiding greenfield land as far as possible helping to conserve and enhance the quality & character of our built and natural heritage helping to conserve, enhance and restore the diversity and resilience of the District's wildlife sites

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

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 180\21

**Respondent:** J S Bloor Ltd

**Representation** Whilst Strategic Objective 2 is supported in principle in terms of the need to protect and enhance the **(soundness):** District's natural environment and cultural assets, an objection is made to the second bullet point of the Strategic Objective as there is an over reliance on brownfield sites to meet housing needs. The review of the sites in the SHLAA is based on sites which satisfy current policy i.e. no sites that are within the Green Belt have been considered as potential development sites. The SHLAA states that sites which are available, suitable and achievable when aggregated together give a total of 11,289 units, however, this includes some sites within the Western Riverside which are within Flood Zone 3a.

The Core strategy is unsound as it relies on the contributions from brownfield sites which require significant investment from the public sector £27million. Sufficient land should be made available to meet the level of housing need in line with the Government's objective in PPS3 that the Government's key housing goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. (PPS 3 paragraph 9) PPS 3 Planning for housing policy objectives also sets out the specific outcomes that the planning system should deliver PPS 3 paragraph 10) - one of which is to provide a sufficient quantity and housing taking into account need and demand and seeking to improve choice; also a flexible supply, responsive supply of land - managed in a way that makes efficient and effective use of land, including the re-use of previously developed land, where appropriate.

An objection is made to the second bullet point in Strategic Objective 2 "avoiding greenfield land as far as possible". Development on some greenfield land is necessary in order to make sufficient provision to meet housing needs to 2026. The latest 2008 based household projections indicate a need to make provision for at least 16,000 households, the SHLAA has demonstrated that land is available, deliverable and suitable for only 11,289 units, consequently provision should be made on greenfield sites to meet the shortfall.

The implications of failing to meet housing need has already been acknowledged by the Council in the

consultation on the Spatial Options in 2009 and this was on the basis of a much higher figure of 15,500 dwellings included in the consultation. There is a significant affordable housing issue in BANES which should be addressed. The reduction in the housing provision will not assist in meeting much needed affordable housing as set in the Strategic Housing Market Assessment (2009).

**Change sought to make sound:** The spatial vision for BANES should be revised to reflect the need to provide for additional dwellings in accordance with the latest 2008 based household projections and taking into account evidence of housing need. The spatial vision for Keynsham in particular should be amended to include the opportunities for development at south west Keynsham. Strategic Objective 2 should be amended by deleting the words in the second bullet point “.....and avoiding greenfield land as far as possible.”

**Representation (legal compliance):**

**Change sought to make legally compliant:** In order to be consistent with the development plan provision should be made for at least 18,500 dwellings in the plan period.

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**Reference:** 245\12 S

**Respondent:** Environment Agency

**Representation** Objective 2

**(soundness):** We support the addition of the helping to conserve, enhance and restore district wildlife sites. We are also pleased to see that the need to avoid water pollution has been included as recommended by the Sustainability Appraisal. It is particularly important that this objective is established at a high level, given the need to protect the thermal springs in Bath.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 251\1

**Respondent:** Bovis Homes

**Representation** Bovis Homes wishes to draw attention to the other representations submitted by Barton Willmore.

**(soundness):**

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 255\4

**Respondent:** Taylor Wimpey Developments

**Representation** Why We Consider The Core Strategy Unsound

**(soundness):**

We object to Objective 2 in that it does nothing to meet social and economic objectives for the District and is therefore contrary to national policy.

PPS1 paragraph 4 sets out four areas for sustainable development:

- Social progress which recognises the needs of everyone;
- Effective protection for the environment;
- The prudent use of natural resources; and
- The maintenance of high and stable levels of economic growth and employment.

These remain Government policy and the present Government has placed sustainable development at the centre of its planning policies.

We have shown in our objections to Policy DW1 that the Core Strategy's proposals do not meet the social and economic needs of the District. As such there is no effective balance between the four

objectives of sustainable development and the proposals are therefore not sustainable. It is not sustainable to consistently underprovide for housing nor to make inadequate provision for new job growth.

We also submit that Objective 2 completely contradicts Objective 3, which seeks to stimulate a more productive, competitive and diversified economy. It also contradicts Objective 5 which seeks to respond to expected demographic and social changes and to support the labour supply to meet economic objectives.

**Change sought to make sound:** Objective 2 should be recast to reflect all four objectives of PPS1 paragraph 4.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\3

**Respondent:** Bath Heritage Watchdog

**Representation** Objective 1, Bullet point 4 "promoting sustainable and energy efficient design and construction".

**(soundness):** This is a sound objective as far as it goes, but it should embrace whole life costs not just design and construction. It does not address the biggest embodied carbon penalties which arise from demolishing an otherwise sound building in order to build something else; and that something else being constructed with the expectation of having a fairly limited life.. Huge amounts of energy are devoted to manufacturing steel and concrete and glass and then shipping them long distances to a building site, only to build what can only be regarded as a temporary building with a 30-50 year life, then to have large amounts of energy devoted to demolition and reclaiming the raw materials for recycling. Sustainable construction should include a longevity expectation of more than a century, which would probably rule out buildings build on steel frames with copious amounts of glass, cladding panels and of a short life-span.

**Change sought to make sound:** Add longevity targets, and an expectation that demolition should always be a last resort.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\4

**Respondent:** Bath Heritage Watchdog

**Representation** The statement "Helping to conserve & enhance the quality & character of our built & natural heritage"

**(soundness):** sounds acceptable, but past experience of planning decisions indicates that there is a lack of comprehension of what the quality and character of the built heritage is. Even when there is an attempt to define it for a particular location in an SPD, planning permission for developments that do not comply with the SPD are still granted. One specific example is planning application 06/00274/FUL (BFI Waste Systems) which was given planning permission despite not meeting several of the mandatory requirements of the Western Riverside SPD. There are many others.

Council behaviour indicates that the built & natural heritage are low on the agenda:

- There has been a reduction in staffing levels of the built heritage team and enforcement team which has left insufficient manpower to properly discharge the duties expected of them.
- There is a steadily increasing number of buildings at risk, a number of them council owned (and neglected) Despite the Government introducing a category for Locally Important Buildings, and the necessary policy to protect them being embodied in the Local Plan, the council has steadfastly refused to implement the mechanisms that would make it effective.
- Planning permissions have been granted for developments which put at risk heritage assets or their settings.

There has been a failure to protect the Green Belt from inappropriate of unauthorised developments (Woolly Valley), and approval of some plans which the Green Belt legislation should have prevented

such as Bathampton Meadows (Park & Ride) and Claverton Down (Bath University expansion).

This part of the Core Strategy is unsound because the council has consistently ignored it in the past, and has made neither staffing nor funding provision to deliver it in the future.

**Change sought to make sound:** Without guidance where it does not already exist, and strict enforcement of the guidance where it does, this Objective is undeliverable. The Core Strategy needs to include credible proposals for delivering this objective (even if it is only reference to documents yet to be written), and “Bathness” should be defined and enforced in the Local Plan. Bath Heritage Watchdog will assist in the production of these, if asked.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\5

**Respondent:** Bath Heritage Watchdog

**Representation (soundness):** Objective 2 Bullet Point 4 “Maintaining ... well linked green spaces”. The use of the Newbridge section of the old LMS line for the BRT route destroys a valuable green corridor, even removing back gardens that were previously mandated in order for permission of the houses that would use them to be given. The granting of permission for a car park on Bathampton Meadows destroys an open space previously recognised as a wildlife haven. Planning permission has been given for the construction of a house on a green space previously conditioned to be a shared garden for nearby flats in perpetuity.

As an objective, it sounds good, but it is not believable.

**Change sought to make sound:** This council demonstrates time and time again that does not follow its own rules. There is nothing that can be said on this subject that would sound credible, unless breaking the rules is made a disciplinary matter.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\6

**Respondent:** Bath Heritage Watchdog

**Representation (soundness):** Bullet Point 5 “Helping to conserve ... wildlife sites”. As an objective it is desirable. As an objective that is likely to be delivered, it is not believable. There was a site in Newbridge which was designated a Site of Special Scientific Interest by the council because of its flora and fauna along with its associated species. Then later the council raised a planning application to tarmac over a large section of this site, reduced the previously necessary maintenance of the site, and then granted itself planning permission to extend a car park.

The solution to the treasured flora and fauna was to take them from their shaded riverside alluvial flood plain where they have lived for many years, and transfer them to an open hilltop site with clay soil. If that happens, they will die; which shows the abysmal level of knowledge about how to conserve wildlife, and the lack of desire to preserve a habitat. Similarly, the impact of bright illumination on Bathampton Meadows which is a bat feeding area, was ignored in the desire of the council to grant itself permission for a car park there.

**Change sought to make sound:** This council demonstrates time and time again that does not follow its own rules. There is nothing that can be said on this subject that would sound credible, unless breaking the rules is made a disciplinary matter.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\7

**Respondent:** Bath Heritage Watchdog

**Representation** Objective 2 Bullet Point 6 “Helping to avoid ... light and noise pollution”. A worthy objective but **(soundness)**: undeliverable.

There have been a number of occasions where buildings with very large areas of glass have been advocated by councillors and/or council officers; and several have been granted planning permission, the latest being the “Welcome Building” for Bath College. Little consideration is given to the impact of air conditioner noise late at night and early morning delivery vehicle in mixed use areas.

**Change sought to make sound:** Including a definition of “Bathness” in the Local Plan or a specification limiting the amount of glass that can contribute to light spill would help, provided it is enforced.

There is already sufficient protection against noise in legislation, but there needs to be more thought given to potential impacts in order to make a difference. The impact of noise on inhabitants of new developments is usually considered; the impact on existing neighbouring residents, less so.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\8

**Respondent:** Bath Heritage Watchdog

**Representation** Objective 2 Bullet Point 7 “Capitalising on the role our heritage has”. Most council descriptions of **(soundness)**: heritage are limited to the Georgian and Roman periods. There are just token gestures to other periods and an unwillingness to recognise the Industrial Heritage and the value of the Victorian and Edwardian eras towards the homogeneous impression of Bath given from many viewpoints. Almost every inter-war building that hasn’t been listed has been lost by an unstated policy of permitting demolition. Local distinctiveness is so downplayed (even despised) that planning permissions can be given to a reflective ceramic clad extension to a Grade 1 listed Georgian Bath stone building; a sweeping roofline resembling raised eyebrows unlike anything anywhere else in Bath can be described as representative of Bath and be granted permission; and in a Conservation Area permission can be granted for walls vertically clad in black zinc! This despite an adopted SPD: “Bath City Wide Character Appraisal” which describes the essential character of each area of Bath

**Change sought to make sound:** This council demonstrates time and time again that does not follow its own rules. There is nothing that can be said on this subject that would sound credible, unless breaking the rules is made a disciplinary matter. Also the Core Strategy should specifically clarify that the entire city is a World Heritage Site, and its heritage is a continuous evolution from the Romans to the 20th Century.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\9

**Respondent:** Bath Heritage Watchdog

**Representation** Objective 2 Bullet Point 8 “Maintaining an outstanding built environment” This is now almost **(soundness)**: impossible to take seriously. The Western Riverside has got Outline permission for what will look like a Soviet Era housing estate, despite UNESCO requesting a redesign. Southgate is an overscaled poorly detailed ‘pastiche’ of the worst kind. Designs promoting large areas of glass and inappropriate materials are lauded. There is almost routinely a failure to adhere to local and national planning policies relating to the built environment. The natural environment is readily sacrificed for unpopular and unviable transport schemes with no proven benefit. There is a total failure to listen to the electorate.

**Change sought to make sound:** This council demonstrates time and time again that does not follow its own rules, or indeed the legislation on Conservation Areas and Listed buildings. There is nothing that can be said on this subject that would sound credible, unless breaking the rules is made a disciplinary matter.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 280\2 S

**Respondent:** Scott Brownrigg

**Representation** Strategic Objectives, pages 15, 16 and 17  
**(soundness):**

Objective 2 - We support the objective to seek to ensure that growth and development takes place within the environmental capacity of the District.

Objective 3 - We support the objective to seek to enable 'tourism to continue to make an important contribution to the economy of Bath.

Objective 4 - We support the introduction of suitable commercial space as part of new mixed use developments on underperforming sites in Bath City Centre, and improvements to the quality of the public realm.

Objective 5 - We support the Council's objective to provide housing that responds to need in terms of demographic and social changes and to support labour supply.

Objective 7 - We support the delivery of well connected places assessable by sustainable means of transport by locating and designing new development in a way that reduces the need and desire to travel by car and encourages the use of public transport, walking and cycling.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 281\4 S

**Respondent:** Natural England

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

Spatial Vision and Strategic Objectives

We also welcome Objective 2 and are particularly pleased to see the protection of natural assets and the provision of Green Infrastructure so high up in the Core Strategy's list of priorities.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 283\3 S

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

**Representation** Strategic Objective 2

**(soundness):** Prior Park College and Paragon School supports the objective to protect and enhance the District's natural, built and cultural assets and provide green infrastructure. The college particularly support the aim to capitalise on the role of heritage has in promoting local distinctiveness, place making and regeneration. The continued identification of Prior Park College as a major developed site in the Green Belt will help to facilitate continued investment in the facilities.

**Change sought to** Summary

**make sound:** Prior Park College and Paragon School are very keen to protect its ability to re-invest and enhance the high standard of facilities currently offered by the College and the School. To achieve this, the Council

needs to recognise the key role of the establishment and to plan for its enhancement by continuing the College's designation as a major site within the Green Belt. If this designation is lost then the College will experience significant barriers to continue the ongoing programme of investment.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 286\6

**Respondent:** Horseworld

**Representation** The second SCS objective is to protect and enhance the district's natural, built and cultural assets and  
**(soundness):** provide green infrastructure. The first bullet of Objective 2 is to ensure that growth and development takes place within the environmental capacity of the district whilst the second bullet seeks to make optimum use of Brownfield opportunities in meeting housing and economic development needs and avoiding Greenfield land as far as possible.

Whilst the objective of prioritising the development of Brownfield land and to protect the natural and built environment is laudable it is considered that the objective has been structured so as to justify some of the Council's other policies in respect of the inadequate provision of additional housing land to meet the actual needs of the District. The second objective, which is clearly an objective which seeks to protect the natural and built environment at the expense of the provision of much needed new housing land, which will be prejudicial to the future growth and sustainability of the economy. This objective is an ideological attempt to avoid all development on Greenfield land which is prejudicial to the future sustainability of the District.

**Change sought to** Change the emphasis of Objective 2 to recognise that some development is deliverable in the context  
**make sound:** of the natural, built and cultural assets of the District. Do not prioritise the protection of the natural environment to the detriment of the wider sustainable growth of the District.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 297\1

**Respondent:** Bath Rugby Club

**Representation** Bath Draft Core Strategy  
**(soundness):** Representation. On behalf of Bath Rugby Club  
Page 15, Strategic Objective 2

**Change sought to** We consider that a specific reference to "sport" should be included. We consider the Objection 2  
**make sound:** title should be amended to include "sporting" after "cultural", We consider an additional bullet-point should be included that seeks to promote the improvement of sporting facilities to the betterment of Objective 6 - health and well-being. And objective 3 and ~ economic development and diversity and in the investment of the physical fabric of the centre.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 318\1

**Respondent:** MOD

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

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

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 821\6

**Respondent:** Cam Valley Wildlife Group

**Representation** 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:**

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**Reference:** 821\10

**Respondent:** Cam Valley Wildlife Group

**Representation** 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:**

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**Reference:** 822\8

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

**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:**

**Plan Reference:** Strategic Objective 3: Encourage economic development, diversification and prosperity.

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**Reference:** 102\14

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

**Representation** Para 1.27, Objective 3 (p16) and Strategic Issues (3) (p29) (Growth in Bath)

**(soundness):** FoBRA is pleased that the existing in-commuting imbalance has been addressed but the document is weak on detail and an understanding of the need to raise economic prosperity on a per-resident basis, not simply to 'grow the economy'. More sectoral details needed.

**Change sought to make sound:** The Core Strategy is the ideal opportunity to establish 'priority sectors' for economic development.

**make sound:** Examples could be:

- higher education as an economic sector in itself;
- technology/engineering-based employers of our local graduates;
- the arts as an economic sector in itself;
- perhaps a regional public/private medical centre of excellence;
- perhaps regional professional business services;
- tourism (of course), and
- retailing (of course).]

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\10

**Respondent:** Bath Heritage Watchdog

**Representation** Objective 3 Bullet Point 1. We seriously question this need for modern office space in Bath.

**(soundness):** Approval was granted two years ago for a modern office block in Brougham Hayes there is no sign of it being built. Some offices that have been built and left empty have been attempting to get planning permission for retail instead, so depressed is the market. All over Bath there are 'office space to let' signs, as is the case in Bristol, Chippenham, Trowbridge, Frome and many other towns around Bath. The current availability far exceeds the demand. The current statistics on the economic recovery show that the only area of growth is manufacturing, with shop staff and administration staff numbers shrinking. Helphire has recently withdrawn from half of its office accommodation, and that is a modern building, so the type of building is not likely to be a key factor, particularly when the Bath Building Society recently moved out of a Grade II listed building to move into a Grade I listed Georgian building. Most businesses agree it is possible to work successfully from a listed building, and it is managers rather than the junior staff who favour open plan working, from their separate offices alongside the open plan areas. There is contradictory evidence over the benefits and drawbacks of open plan working. The trend is for increased travel costs to be offset by increasing numbers of staff working from home. B&NES has plenty of empty office space of all types, and there are extant planning permissions in place for new office space which isn't being built because of a lack of demand, and over the duration of the Core Strategy, that demand is likely to shrink further. If businesses move from the historic building office space, attracted perhaps by "sweeteners" to move into a newly built office what will happen to those emptied historic buildings? The best preservative for a historic building is to have it in use; vacant old buildings deteriorate rapidly. A policy of building large amounts of new office space is likely to result only in the short term benefit of construction companies, and yet within the timetable for the Core Strategy, office buildings constructed as "modern offices" are likely to result in acres of unwanted office floor space that will be difficult to adapt for any other use.

Generally speaking, large organisations seeking to relocate will look for not just floor space but on-site parking facilities for senior staff, visitors, and branch or sales staff who need to report in at intervals, and Bath's plans do not fit the bill, though the Somer Valley locations might if only the public transport links were better. More likely though, Wiltshire's more generous attitude to car use and parking are going to make such destinations far more attractive than B&NES.

**Change sought to** Remove the emphasis on modern office building. Instead, promote the use of those already lying  
**make sound:** empty. Office space should ideally be near shops to maximise local benefits. What are really going to be useful to Bath's prosperity are affordable small business premises for start-up businesses. And as new construction always costs much more than adapting an existing building, conduct proper research on what is already available. Office space alongside industrial space would be ideal. For council owned properties, lower initial rent until a new company gets established (perhaps with a profit share agreement during the subsidised period) would be better than no rent from an empty property, so that should become a policy to tempt new businesses in.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\11

**Respondent:** Bath Heritage Watchdog

**Representation** Objective 3 Bullet Point 2 "Maintaining an appropriate supply of land for industrial processes"

**(soundness):** This is difficult to believe and rather ironic as the BRT route goes through a light industrial estate and has forced people out and relocated others to outside the area. Future regeneration plans will see further loss along the Lower and Upper Bristol Roads and Newbridge. There are contradictory sections in the Twerton & Newbridge Riverside sections which say that industrial space is to be allowed to contract, which pre-judges what an adequate supply might be.

There are no small business start up units in Bath which are needed. We need more industrial for a mixed economy because there is already an over-supply of office space.

**Change sought to** As a minimum, remove the contradiction of reducing industrial space and maintaining an adequate  
**make sound:** supply. The strategy should be written so that it sounds encouraging to industrial businesses. At the moment Industry sounds like an inconvenience, which is hardly going to tempt businesses in.

Remember that at this stage of the recession, Industry is the only sector employing more people than it is shedding, and the Government's forecast is a long period of the same.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\12

**Respondent:** Bath Heritage Watchdog

**Representation** Objective 3 Bullet Point 3 "enabling tourism to continue to contribute" The majority of tourists come to  
**(soundness):** see the historic buildings and Roman Baths and take pleasure in seeing Bath stone which is so different from the red brick and the glass and steel they see elsewhere. What they don't expect is stark modern buildings they can see at home. They want photographs of historic Bath, and will object to taking pictures with tower cranes in the background. If we are looking at a programme of regeneration over large swathes of the city, then it will become a vast building site and nothing will have a greater effect of putting off visitors than that. Planning permissions are already in place for a considerable increase in hotel accommodation and more attention should be paid to other types of visitor accommodation. Some increase may be needed but not more hotels: there are many people who will not stay in hotels so the B&B and self catering sectors also need to be boosted to create a balance. There is a distinct shortage of self catering holiday flats, for instance, but a typical family using one will want adjacent free parking because of the amount of luggage they bring, so this needs to be enabled by policies. By introducing inappropriate (ie not what the visitor expects to see) development to the city we will affect the very reason people come to the area and this will drive away visitors. Simple things such as using the WHS logo on leaflets & websites to raise the profile would be useful advertising. Bath does not use the WHS status to promote itself, and it should. A museum of Bath is needed as an interpretation centre, as required by UNESCO.

**Change sought to** This strategy needs to make up its mind whether to go for massive redevelopment and lose the  
**make sound:** tourists, or whether to scale down the modernising agenda and enforce the extant SPD that attempts to preserve local distinctiveness and thus promote tourism. They are contradictory futures and it is impossible to do both. It is perfectly possible to build what the tourists regard as a traditional looking building, and yet to have the interior as modern as the occupants wish. Our recommendation is to look after the tourists. Too many jobs are at stake if tourist numbers drop. That means enforced design codes that preclude eyesore buildings. That doesn't mean modern buildings can't be built, just that they must fit in. Compare Waterside Court and Charlton Court next door to see the wrong way and the right way to design modern buildings, which in this case have identical functions. Bath Heritage Watchdog will assist in the preparation of the necessary design codes if asked.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\13

**Respondent:** Bath Heritage Watchdog

**Representation** Objective 3 Bullet Point 4 "Improving educational facilities to help provide the skills that support  
**(soundness):** knowledge based sectors" Nowhere in the document does it define the "knowledge based sectors" nor identify what the skills are that support it. There is no evidence that the existing postgraduate provision is over-subscribed. This sounds like a "nice idea" rather than a thought through policy, and as such has no place in a strategy. There is a danger in relying too heavily on the universities now that the Government has raised the cap on fees. The forecast is that the demand for university places will reduce as more school leavers opt for a trade rather than a degree.

**Change sought to** The strategy should be to be alert for the opportunities of benefiting from the talents from the  
**make sound:** educational establishments rather than providing for them in advance and assuming they will follow.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 277\7 S

**Respondent:** Ashtenne Industrial Fund Limited Partnership

**Representation** Objective Three

**(soundness):**

Ashtenne acknowledges the Council's objectives for economic development, and supports the objective of increasing the availability of modern office space in Bath. Ashtenne acknowledges the objective to maintain an appropriate supply of land in Bath for industrial processes to ensure the city retains a mixed economy. Ashtenne reiterates that the site at Wansdyke is no longer appropriate for continued employment purposes due to surrounding uses and the low grade nature of the buildings. In terms of employment land, it is important to note that there are a number of employment sites within the administrative area which would benefit from being redeveloped for alternative land uses as they are not longer viable for their existing purpose. Our client's site is one such example and no longer lends itself to employment use given its constrained nature and residential context.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 286\7

**Respondent:** Horseworld

**Representation** SCS Objective 3 seeks to encourage economic development, diversification and prosperity and to

**(soundness):** stimulate a more productive, competitive and diversified economy across the district with a particular emphasis on knowledge based sectors.

Objective 3 and related objectives I policies seems to fail to fully recognise the requirement to provide additional housing capacity in order to allow for the flexibility and growth within the economy generally and particularly in respect of diversification and provision of appropriate factors which will attract knowledge based sectors to the district. This Core Strategy seeks to make a significant intervention into the social and economic direction of growth for BANES which is considered to be both beyond the remit of Core Strategy process and unlikely to be achievable or sustainable in the medium to long term. As identified in other representations made on behalf of Horseworld the Core Strategy does not sufficiently demonstrate the ability or funding of the Council to make the interventions that are proposed.

**Change sought to make sound:** Allow for greater flexibility in the economic growth strategy. If smart growth is to remain a core principal it should be referred to in Objective 3. Reconsider the 'smart growth' agenda given the lack of resources for the Council to make the necessary interventions - furthermore, properly define those interventions.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 298\1

**Respondent:** Liberal Democrat Group

**Representation** Objective 3, third bullet point

**(soundness):** Omission. The core strategy does not include a policy on managing the provision of visitor accommodation and the growth in this sector over the period of the Core Strategy, as proposed in the B&NES Visitor Accommodation Study.

Management of the growth in this sector is required to ensure that the varied visitor accommodation offer, which is important to the attractiveness of B&NES as a visitor destination, is preserved.

**Change sought to make sound:** "enabling tourism to continue to make an important contribution to the economy of Bath and promoting the tourism potential of other parts of the District e.g. by managing the provision of visitor accommodation".

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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

**Reference:** 139\1 S

**Respondent:** London Road and Snow Hill Partnership

**Representation** The Partnership notes the council's desire to promote "healthy and attractive urban centres" and the  
**(soundness):** desire of the council, as expressed in the document to encourage "high quality environment in which to reside, locate and grow business, visit and invest. The Partnership looks forward to the policy being implemented in the London Road area. Objective 4 only notes the need to introduce more commercial space as part of new mixed use developments on underperforming sites

**Change sought to** There needs to be mention of under-used buildings as well as sites, with note advocating policies to  
**make sound:** promote the commercial use of commercial buildings that are under used.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 265\14

**Respondent:** Bath Heritage Watchdog

**Representation** Objective 4 Bullet Point 2 "Enhancing Bath's central shopping area, to maintain its competitiveness,  
**(soundness):** diverse offer & reputation for independent & niche retailing" There is no disagreement that the central shopping area is important, but Southgate has proved that it has no room for diverse, independent and niche retailing. Its shops are all too city-centric with nothing of interest to the lower income areas south of the river. It is also not particularly diverse, consisting mostly of "High Street, Anywhere" shops and a few restaurants and coffee houses. Its car park is too expensive. Milsom Place is hardly any better for content. The cost has been the loss of stores up the main shopping axis as they all take advantage of the special deals enticing them to relocate, which must affect the trade of those that remain. Shops in the central area catering for the residents, particularly the over 50s, as opposed to for the under 30s, are hard to find. Where is the Pound Shop, the Wilkinsons, the "baked on the premises" traditional bakers?

By contrast, Bath's previous reputation for independent traders, niche products and small historic shops that people come to see is largely in the past. That type of shop has narrow profit margins, and rent rises have driven most into surrounding towns and villages. The street scene is also deteriorating as shops open in listed buildings and paint the historic shopfronts in garish colours, and on the few occasions when planning permission is actually sought permission is rarely refused. Mostly though, the premises is repainted without a planning application and the shop is allowed to get away with it. Part of the shopping experience is the character of the street, and startling colours, windows plastered in garish vinyl and electricity being wasted on unnecessary lights detracts from the street scene. More effort should be made to prevent inappropriate alterations which are having a cumulatively detrimental impact. The other major problem is clutter. "A" boards, unauthorised furniture etc make some pavements an obstacle course. Often they are in historic streets which ruin the photogenic qualities the location might otherwise have.

**Change sought to** There needs to be a policy of retaining, and if possible attracting more niche market shops. Ideally  
**make sound:** there should be a separate Use Class of Independent Retail, to reserve affordable premises for them. There is a general attitude that big names are important, and as a result, Southgate is completely devoid of any curiosity value as far as product lines are concerned, and so few shops there have a shopfront of any character (just an aluminium frame holding large panes of glass, mostly) that most residents do not regard it as their shopping centre at all. The preservation of the character of historic shopfronts should be vigorously enforced. There should also be a saturation policy for all types of non-retail premises, which would have stopped Moorland Road being overrun with Estate Agents and central Bath with coffee shops and cafes. The public realm improvements need to cover a greater area of the city.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\15

**Respondent:** Bath Heritage Watchdog

**Representation (soundness):** Objective 4 Bullet Point 3 "Introducing more commercial space" UNESCO asked for Mixed Use in Phase 1 of the Western Riverside, but planning permission was granted for a scheme without it. The Carr's Mill planning application for a mixed use development was refused permission. Other "mixed use" opportunities have been devoted to student residences. There is no evidence that there is any will to grant planning permission in Bath to increase commercial space. Quite the opposite. Thriving commercial business were removed from the Riverside Business Park. Including this in the Core Strategy looks like box ticking rather than an objective to be pursued.

**Change sought to make sound:** Identify what sort of business is expected to occupy commercial space, and a policy for attracting it.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\16

**Respondent:** Bath Heritage Watchdog

**Representation (soundness):** Objective 4 Bullet Point 6 "Improving the quality of the public realm" The ideas for the public realm as shown in the "Transform And Treasure" exhibition were mostly completely alien to the character of Bath. So while the idea of improving the public realm sounds attractive, the likelihood of what is currently being propose achieving an improvement seems too remote to be credible. The city centres public realm is poor, but lorry loads of pennant paving and shiny way markers don't create a place of fascination. The public realm strategy is again centre biased with no improvements south of the river or anything higher up the northern slopes than Queen Square. See also the comments made against Bullet Point 8. One thing that already ruins the public realm is the proliferation of "A" boards and other street detritus, and controlling these should be a priority. Some parts of Bath are an obstacle course because of them.

**Change sought to make sound:** The only way to discover what the public wants in the public realm is to ask the long term residents (eg. Those resident in the 2001 census and still resident) what they would like to see in the public realm. The Core Strategy should be to ask first and then deliver what they want, rather than assuming that what has been done elsewhere would be appropriate. York has banned the placing of "A" boards on pavements. Bath should either do the same or require planning consent before one can be used, so that what sized board is used, where it should be placed, and what hours it can be placed there are fully controlled.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\18

**Respondent:** Bath Heritage Watchdog

**Representation (soundness):** The Rec is supposed to be retained as an open space in perpetuity, yet the council actively supports the aspirations to build on it.

**Change sought to make sound:** Recognise that there is a conflict of interest having councillors appointed as trustees of the Rec, and introduce a strategy of having them stand down in favour of fully independent trustees, chosen by the residents of Bath from a list of nominees.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 298\2

**Respondent:** Liberal Democrat Group

**Representation** Objective 4, third bullet point

**(soundness):** This paragraph is inconsistent with strategic policies in the Sustainable Community Strategy on climate change, economic development and investment in city, town and local centres.

Objective 4, eighth bullet point

Reference to play areas should be made to underpin the effectiveness of development which promotes health and wellbeing.

**Change sought to make sound:** “introducing more commercial space as part of new mixed use developments on underperforming sites in and close to Bath city centre to include suitable premises for small and medium enterprises”.

“ensuring existing and proposed parks and play areas are well integrated into, and play a central role in, the centres of Bath, Keynsham and Midsomer Norton”.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Strategic Objective 5: Meet housing needs.

**Reference:** 180\22

**Respondent:** J S Bloor Ltd

**Representation** The Core Strategy is unsound as it is not the most appropriate strategy when considered against the

**(soundness):** reasonable alternatives. The latest DCLG household projections confirm the trend for higher levels of housing and the Strategic Housing Needs Assessment also confirms the need for provision for a higher number of housing in the plan period. The strategy appears to be based on the short term economic situation i.e. one economic cycle rather than considering the implications of the population growth and household growth for the plan period. It is inappropriate to base the long term spatial vision on the current economic climate.

The Core Strategy should take a more long term view rather than basing its assumptions on the recent years. It is inappropriate to base the long term spatial vision on the current economic climate. If planning is based on a low growth scenario, higher growth will create severe market distortions when it occurs. The SWRDA report “Economic Prediction and the Planning Process” January 2011 states that:- “There is a danger that the South West’s historical under provision is exacerbated if planning figures are linked solely to a particular low “average” growth rate scenario. In turn, this tends to create higher carbon outcomes in terms of commuting and extended travel to work areas and negative social externalities related to housing affordability.”

The report states that there is not a simple arithmetical relationship between a particular growth rate and the need for new housing. The housing target should not be focussed on the short term i.e. what has happened in the last 2 years. The amount of housing growth affects growth in the economy. SWRDA report “Economic Prediction and the Planning Process” January 2011 <http://economy.swo.org.uk/publications/special-economy-modulepublications/> Sets out key messages, the assumptions of less buoyant economic and demographic growth for twenty years were built into the Oxford Economics work because at the time this is what those commissioning the report wanted to be investigated. The SWRDA report states that a more rounded approach would be based on:-

- Demographic change implies a growing demand for new housing going forward across SW England, regardless of the economic growth rate average achieved within the likely range ( 1.5 – 3.0% per annum.)
- There is already a backlog of unsatisfied, ineffective demand in the region, which distorts a range of behaviours linked to employment, commuting, affordability and cohesion.
- In the short term, economic and employment growth will be restrained below pre-recession experience because of government policies and ongoing crisis adjustment.
- Current policy is designed to improve sustainable growth and job creation rates in the longer run (including efforts to encourage living closer to places of work) when that kicks in, growth potential is expected to be higher than before . Whether the South West gets the growth sooner or later, it still

gets it and the broad scope of housing need is unaffected and planning policy should therefore reflect this.

- A return to real incomes growth will generate fresh demands for housing, including multiple home ownership, formation rates, dependency ratios and new unit size mixes.
- Even the modest growth forecast in Oxford Economics work for the 2020s, implies much smaller reductions in house build numbers than local authorities are calculating at present. A 29% reduction in central growth forecast (from 2.8% to 2.0%) extrapolates into cuts in housing need of much less than half that once all relevant economic factors are computed. The paper also states that: predictive planning should be based on a range of scenarios, including one that envisages a return to high growth because single point estimates will be wrong, national and local economic policy wants and expects higher future growth. It is easier to adjust plans lower in the event of a relatively subdued growth outcome than to correct the errors of under planning retrospectively. The report concludes that it would be a major constraint and distortion of future local SW economic development if at the outset, low growth rates are assumed for the analysis of planning.

The SW real growth rate for 1998 - 2008 was 2.5% per annum compound, this is slightly better than the UK average of 2.4%. The SWRDA report states that without a permanent, negative step change in the economy's development process, which implies an unprecedented loss of inventive and entrepreneurial spirit in the SW region, it is difficult to argue that growth rates around 2.5% per annum will not reoccur going forward. Growth rates could return to 2.8%- 3.2% range that existed before the current malaise once economic rebalancing is achieved.

Latest figures indicate that the trend GVA figure is 2.25%, evidence indicates that there is no reason why a full economic recovery is not possible to pre-recession rate of about 3.2% per annum. The evidence from the SWRDA does not point to restricted potential in growth and it is important to plan for full recovery. SWRDA evidence points to SW growth patterns after the recession for future growth between full recovery to recovery with loss. Restricted potential is not envisaged.

Over the life of the Core Strategy, it is inevitable that the economic climate will change, consequently the Core Strategy should be prepared so as to enable appropriate levels of housing provision to occur over the lifetime of the Plan and for it to be monitored accordingly as set out in PPS 3. As proposed the Core Strategy will fail to meet housing needs and respond to demographic and social changes. Failure to meet housing needs will increase those in need of affordable housing and that those who do work in parts of the authority e.g. Bath will have to travel further, increasing commuting and congestion. The lack of housing provision will not support the economic development objectives and increase labour supply.

**Change sought to make sound:** Strategic Objective 5 meeting Housing needs is supported in principle, but it is argued that the housing provision included in the Core Strategy should be increased in line with national DCLG latest household projections of at least 18,500 dwellings.

**Representation (legal compliance):**

The Core Strategy is not in general conformity with the development plan as set out in PPS 12 paragraph 4.50 i.e. it should conform generally to the Regional Spatial Strategy. The Core Strategy is not legally compliant as it fails in to make adequate provision for housing needs during the plan period. It does not conform to latest Government guidance, the development plan i.e. the RS for the SW being the former RPG10 and also in terms of the latest evidence base for the SW RSS or the latest DCLG 2008 based household projections. The Councils own Strategic Housing Market Assessment indicate that there is a very high housing need, both in household growth and in relation to likely total future supply.

**Change sought to make legally compliant:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections and take into account evidence of housing need. The housing figures for the plan period should be increased to at least 18,500 dwellings

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**Reference:** 256\1

**Respondent:** Councillor Andrew Furse

**Representation (soundness):** Objective 5; Comments upon any increase in students – I would stress there is already a major deficit in purpose built student accommodation, so this is more than 'any increase'.



Councillor Andrew Furse  
Liberal Democrat,

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\19

**Respondent:** Bath Heritage Watchdog

**Representation (soundness):** Objective 5. The expected demographic is of an increasing aging population, yet the predominant provision of new homes is in the form of flats. The term "High Quality" does not equate to contemporary. All homes should be built to last using where possible local materials and labour. Room spaces should be defined in an SPD and sufficiently generous that they all meet social housing minimum standards and with adequate amenity space provided, and so any private property built can, if desired, be purchased to increase the social housing stock. Students as far as possible must be accommodated on campus or in purpose built halls of residence outside the campus. At present a large percentage of Baths housing stock is HMOs. In some areas, whenever a family moves out of a house it is bought by a developer and converted into a HMO for students. Some of the elderly, living alone in a family sized home, could sensibly downsize freeing a larger house, but do not want to because they can't bear the thought of their lovely home they have lived in for years being ripped apart to make bedsits for students.

One of the things that allows the elderly to be self sufficient in their own home is ground floor accommodation and good neighbours. There is a mismatch between the assumed housing needs and the future demographics. There is also a conflict between the need for permanent neighbours and the expectation of a growing student population, which if uncontrolled will gradually replace permanent residents. This means that in midsummer when the students are gone, the elderly have fewer and fewer neighbours to watch out for them as time goes on. The issue of necessary infrastructure is not well defined. More housing and more working age residents occupying it will make demands on doctors, dentists, hospitals, schools, water supplies, sewerage facilities, public transport, rubbish and recycling facilities, post offices and various council services. Some of these are outside the council's control, and some are badly timed, so that an increased demand for school places is likely to follow soon after the number of schools has been reduced to save the cost of empty desks. Because of all this, the objective looks undeliverable as stated.

**Change sought to make sound:** The conversion into HMOs needs to be properly controlled through the planning system and a saturation level defined for any location to preserve much needed family sized accommodation. The plans for ensuring that there is sufficient infrastructure to accommodate the other parts of the objectives should be defined.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 286\3

**Respondent:** Horseworld

**Representation (soundness):** SCS Objective 5 seeks to meet housing needs by enabling the delivery of the new homes which are required to respond to expected demographic and social changes and to support the labour supply to meet economic development objectives. Objective 5 also seeks to ensure that new homes are provided with a suitable design quality and which reflect and cater for a range of incomes and types of household, including those in need of affordable housing.

Whilst the principle of seeking to deliver new homes which respond to the expected demographic and social changes and, significantly, which seek to deliver a range of house types including the provision of affordable housing is a sound objective for the Core Strategy, it is considered that the overriding

themes of the Core Strategy will fail to allow the objective to be achieved. Bath and North East Somerset's Core Strategy - Publication Stage Representation Form

As demonstrated in other representations submitted on behalf of Horseworld the Core Strategy proposes to deliver 11,000 homes over the plan period which equates to a maximum provision of approximately 3,400 affordable homes if the Council is able to achieve its desired affordable housing threshold on every residential development site.

Given the current economic conditions (which are clearly reflected in the current wording of the Core Strategy) it seems highly unlikely that BANES will be able to achieve 35% affordable housing on each and every residential development site which is brought forward within the BANES district. Furthermore, the total provision of 11,000 homes is unlikely to allow BANES to achieve its economic drivers, given that there is not appropriate scope to make provision for additional housing demand should, for example, a new business or enterprise decide to relocate to the district. In short the lack of housing supply will become a constraint to the economic driver which is the focus of the Core Strategy.

**Change sought to make sound:** Recognise the need for additional housing in accordance with the housing numbers proposed in the Draft RSS (15,500) or the SoS Proposed Changes (21,300).

Propose an urban extension at Whitchurch to deliver additional housing in a sustainable and environmentally appropriate location. Cross reference Objective 5 or related changes to Policy DW1.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Strategic Objective 6: Plan for development that promotes health and well being.

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**Reference:** 73\4 S

**Respondent:** Newton St Loe Conservation Group

**Representation** Specifically we find sound and support:

**(soundness):** Objective 6 -encouraging and facilitating increased local food production

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 225\2

**Respondent:** Bath & North East Somerset Allotments Association

**Representation** B&NES Allotments Association has approximately 300 members, almost exclusively from among Bath

**(soundness):** city allotment tenants. However, our Objectives include the establishment of allotments throughout the District and we work with the town and parish councillors and allotment representatives, and private landlords, to that end.

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

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

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

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

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

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

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

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

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

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

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

The Local Food policy should define 'local', i.e. proximity, for different types of food production, e.g. allotments should be provided within 600 metres of residence, as set out in the Green Spaces Strategy. Proximity definitions would need to be defined, but - for example - commercial horticulture of vegetables and fruits within 5 km, meat and poultry within 8 km. Time and volume-based targets should be set, so that for Bath an example would be: "By 2026, half the fruit and vegetables consumed will be grown within the city boundary, including in: gardens, allotments and smallholdings, market gardens and community supported farms." This would return Bath to the horticultural productivity levels of the 1950s.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 261\4 S

**Respondent:** RUH NHS Trust

**Representation Objectives (soundness):**

Objective 6 includes the need to ensure the timely provision of social and physical infrastructure, including health facilities. The Trust fully supports this particular objective and the Policy DW1 that seeks to ensure that infrastructure is aligned with new development and the statement at DW1.4.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\20

**Respondent:** Bath Heritage Watchdog

**Representation (soundness):** Objective 6 Bullet Point 3 “Increased local food production”. The best way to achieve this is to increase the amount of land available to allotments. Yet despite there being legislation governing the provision of allotments, residential developments rarely result in the ideal number of additional allotment plots being provided.

**Change sought to make sound:** Introduce a policy of requiring developments of more than 15 residential units being required to provide allotment plots as part of an S106 agreement.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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

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**Reference:** 93\1 S

**Respondent:** Highways Agency

**Representation (soundness):** The Agency strongly supports the inclusion of this strategic objective

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\21

**Respondent:** Bath Heritage Watchdog

**Representation (soundness):** Objective 7. The points are all valid; but it is by the proposed method of delivery that they become ineffective. The major plank in the Transport Package is the current “universal solve all” of the BRT running from a place only easily accessible by car to a place only accessible by car, on a route that offers no time saving, removes existing businesses and loses green space. The planning permission for the Transport Package is of dubious legality and there are those prepared to challenge it in court if it is pursued. The Compulsory Purchase Orders for some parts of the route are likely to be refused if the Public Inquiry proceeds. The BRT route cannot therefore be built, and pursuing it will be a waste of money.

The one easy way to make public transport more attractive would be to reduce the price of the fares and this appears impossible given the current near monopoly of First Bus. Parking might be expensive in Bath and act as a deterrent, but it remains cheaper to drive to Keynsham, park, shop and drive back than it is to take a bus from any of the denser populated areas into central Bath and back. For most residents who want to go to central Bath, it is often cheaper to drive to a Park and Ride site for a bus into Bath than it is to get a bus from their house to the centre. Unless those economic models changes significantly, public transport will never be the first choice option for any household that owns a car, except perhaps for Diamond Card holders. Thus far in the strategy no mention of river or rail use and improving these. Rail would be particularly beneficial for commuters to and from Box, Melksham and Corsham in Wiltshire.

**Change sought to make sound:** Delete the reference to the Transport Package: it will be impossible to deliver. Recognise that the cost of the BRT route, running east-west where bus services are already adequate, would be better spent on promoting rail travel east-west to relieve the volume of traffic on the roads (something that buses contribute to!). Something overlooked is the need to improve transport links north-south. Add this.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 1.16

**Reference:** 180\4

**Respondent:** J S Bloor Ltd

**Representation (soundness):** The Core Strategy is unsound as it is not the most appropriate strategy when considered against the reasonable alternatives. The latest DCLG household projections confirm the trend for higher levels of housing and the Strategic Housing Needs Assessment also confirms the need for provision for a higher number of housing in the plan period. The strategy appears to be based on the short term economic situation i.e. one economic cycle rather than considering the implications of the population growth and household growth for the plan period. Over the life of the Core Strategy it is inevitable that the economic climate will change, consequently the Core Strategy should be prepared so as to enable appropriate levels of housing provision to occur over the lifetime of the Plan and for it to be monitored accordingly.

Paragraph 1.16 states that the Council in setting out the policy approach it has taken into account national policy guidance, the results of key studies and other relevant evidence as well as the issues identified through the consultation on the Core Strategy. National Policy Guidance PPS 3 is to make provision for sustainable development and the government's key housing policy goal as set out in paragraph 9. Paragraph 33 states that in determining the level of housing provision Local Planning Authorities working together should take into account evidence of current and future levels of need and demand for housing and affordability levels based on local and sub regional evidence if need and demand as set out in the SHMA and other relevant housing market information. Advice from the NHPAU, and the Government's latest published household projections and the needs of the regional economy, having regard to latest economic growth factors. In determining the local level of housing provision PPS 3 advises in paragraph 33 that the advice from the NHPAU should be taken into account. The West of England Housing Market Assessment ( June 2009) states in paragraph 11.1.8 that "Regional analyses by NHPAU indicate that the South West region is one where greater housing supply will be needed to moderate affordability pressures and meet demographic demand." There is a high level of need for affordable housing which is not being met through existing policies and levels of delivery.

Economic projections – latest evidence from the SWRDA and OBR points to the risk of weaker growth, lower employment and higher inflation for the period 2011 – 2013, but beyond that the economy starts to improve. Office of Budget Responsibility (OBR) forecasts produced in November 2010 indicates a steady rise in GDP over the years to 2014. The Core Strategy as currently prepared will fail to meet housing needs and respond to demographic and social changes. Failure to meet housing needs will increase those in need of affordable housing and those who do work in parts of the authority e.g. Bath who cannot afford to live there to travel further, increasing commuting and congestion. The lack of housing provision will not support the economic development objectives and increase labour supply and have an adverse effect on the local economy.

**Change sought to make sound:** The spatial strategy for BANES should be revised to reflect the need to provide for additional dwellings in accordance with the latest 2008 based household projections. The spatial vision for Keynsham in particular should be amended to include the opportunities for development at Keynsham.

**Representation (legal compliance):** The Core Strategy is not in general conformity with the development plan as set out in PPS 12 paragraph 4.50 i.e. it should conform generally to the Regional Spatial Strategy. The Core Strategy is not legally compliant as it fails in to make adequate provision for housing needs during the plan period. It does not conform to latest Government guidance in terms of the latest evidence base for the SW RSS or the latest DCLG 2008 based household projections. The Councils own Strategic

Housing Market Assessment indicate that there is a very high housing need, both in household growth and in relation to likely total future supply.

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

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

## Plan Reference: Paragraph 1.18

**Reference:** 180\3

**Respondent:** J S Bloor Ltd

**Representation** The Core Strategy is unsound, this paragraph refers to the abolition of the RSS which the Council has **(soundness):** considered provided an opportunity to “move away from nationally imposed growth targets and establish its own requirements in response to local circumstances.” The paragraph refers to analysis of new up-to-date evidence.

The RSS has not yet been abolished. Although the Coalition Government have now published the Localism Bill, it will be some time before the RSS is formally abolished. Until then the RSS is part of the statutory development plan and this has been set out in an Advice Note published by the Planning Inspectorate following the Cala Homes decision in November 2010. In the South West the most recent RS had reached an advance stage and although not finalised the evidence base is considered to be a material consideration. The approved RSS is that of September 2001 i.e. RPG 10 which became the Interim RSS in 2004. It is this document that sets out the strategy based on sustainable development and that development should be located at sustainable locations. Policy SS 4 also refers to the need to review the Green Belt.

The strategy set out in the Interim RSS was taken forward in the emerging RSS which is consistent with national planning guidance. The housing figure for BANES in the RSS Secretary of State’s Proposed Changes was 21,300 dwellings for the plan period 2006 – 2026. The housing provision was based on the 2004 household projections. The justification for the overall housing provision was set out in the Schedule of the Secretary of State’s Proposed Changes - July 2008 and focused on the Government’s key housing policy goal of ensuring that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. This is still the Government’s key housing policy goal as set out in the recently published PPS 3 in June 2010.

The justification for the provision in the RSS was based on the South West being a high demand region for housing, which is a function of population growth (through in-migration to the region), demographic and social trends (which manifest themselves in declining household size) and rates of economic growth above the national average. The advice in the NHPAU report “Affordability Matters” outlined the need to test a housing supply range of between 28,700 to a high point of 34,000 for the region by 2016 in order to address long term affordability in the region. This was reinforced by further advice from the NHPAU “Meeting the Housing Requirements of an Aspiring and Growing Nation – June 2008).

The Secretary of State was of the view that the consideration of the best available evidence supported an overall regional provision equivalent of a minimum of 29,623 dwellings per annum of over the plan period. In this context the housing requirement for BANES was increased to 21,300 dwellings. Whilst the latest 2008 based household projections show a lower increase of 16,000 households (ie 16,720 dwellings) for BANES, this is due to the different assumptions in migration. However, the fluctuations in migration can also be due to the restricted housing supply, the more restricted the housing supply, the lower the levels of household growth. There are also concealed households which because of affordability cannot enter the housing market.

The direction of travel in terms of the need for housing arising from the household projections which are a function of population growth, support the need for the increasing housing requirement for

BANES. Population growth is the main driver of household growth. One person households are anticipated to equate to two thirds of the increase in households. There is still a strategic need for housing, the Coalition Government White Paper "Local Growth: realising every place's potential" October 2010 is new government policy which confirms that one of the 3 purposes of the planning system is to provide sufficient homes to meet demand (paragraph 3.1), that new Neighbourhood Plans will provide homes locally to meet need (paragraph 3.9) and that a new local plan will provide homes where a Neighbourhood Plan does not exist (paragraph 3.11).

Whilst the latest economic growth is less than what was anticipated in the RSS, the plan covers a 20 year period and more than one economic cycle, consequently the BANES strategy should be based on the long term. The role of the Core Strategy is to set out the long term spatial vision for BANES up to 2026 and the broad locations for new housing, jobs and other strategic development over the plan period. Over the life of the Core Strategy it is inevitable that the economic climate will change, consequently the Core Strategy should be prepared so as to enable appropriate levels of housing provision to occur over the lifetime of the Plan and for it to be monitored accordingly. If the Core Strategy is based on low levels of economic growth then it will not be in a position to respond to the economy when rates are higher.

Historically, the supply of housing in the South West has been lagging behind demographically based need/demand and the affordability of housing has been worsening. No where is this more evident than in BANES, where the housing provision in the adopted Local Plan has fallen short of the that envisaged , with an over reliance on brownfield sites which have failed to deliver during the economic boom. Affordability has worsened in the authority.

The SHMA evidence refers to the overwhelming message is one of very high housing need, in relation both to household growth and in relation to likely future supply. It concluded that current policies will not be sufficient to meet even a significant proportion of the housing need identified in this SHMA. There is a high demand for family housing which is not being matched by recent supply, which in some areas has emphasised flats and smaller units. BANES has a lower number of detached houses, almost 30% terraced houses and 18% flats.

The latest evidence that the Council refers to is within the BANES Future Housing Growth Requirement to 2026 Stage 2 Report September 2010. This pre - dated the latest DCLG 2008 household projections which were published in November 2010 and shows that the number of households for 2006 – 2026 is 16,000 whilst this is less than the 2006 based figures it confirms the increase from previous projections. The figure of 16,000 households is also closer to the figure BANES submitted as part of the First Detailed Proposals (Options 1 figures which the Coalition Government indicated that some local authorities may want to use these figures rather than those in the RSS). It is not clear how the Council can justify the reduction from 15,500 dwellings (include in the Spatial Options Consultation in 2009) to 11,000 dwellings when the underlying trend is one of an increasing population growth.

During the preparation of the Regional Strategy the First Detailed Proposals for the Joint Study Area of the West of England were submitted to the Regional Assembly by the West of England Partnership. Whilst the Core Strategy states that account has been taken of the Districts functional relationship with neighbouring authorities what has not happened is any collective/joint work in the housing figures and employment requirements for the West of England, including BANES. Each authority has made its own forecasts and established its own targets, at different times and using different approaches from its neighbours, in which case these figures mean that there is a significant under provision. If the figures are compared for the Core Strategies as proposed for the four unitary authorities (i.e. 72,300) with the figures proposed in the RSS Proposed Changes (117,350) then the housing figure shortfall is 45,050 during the plan period. If a comparison is made with the latest 2008 based household projections then the shortfall is 83,700 dwellings (this is largely due to the significant increase in Bristol City, but never the less BANES reduction to 11,000 dwellings for the plan period is a reduction of a third.

Any shortfalls in provision not only have an impact on significant sections of the area in question, its local population and the local economy, but also increase the pressures felt by surrounding local authorities. The consequences lead to housing stress or excessive commuting to access jobs and services outside the immediate areas.

The West of England Strategic Housing Market Assessment (June 2009) states that whilst the West of England Housing Market is a relatively prosperous area with a diverse economic base. "It needs to retain its population to contribute to the wider local economy and to ensure that lack of housing does not begin to cause labour shortages potentially threatening the competitiveness of the area. The growth of longer distance car commuting is ultimately unsustainable in its impact on the local environment and its contribution towards congestion. Future housing supply strategies need to recognise these wider impacts and seek to maximise completions within the existing stock and on new sites within the sub region close to economic centres."

Paragraph 2.8.1

Some of the need for new housing in the area is closely linked to economic growth of the West of England sub region which acts as the "powerhouse" for the South West region. The key issue is how the under provision in housing will affect the local authorities in the West of England in terms of their aspirations for future levels of economic growth, such reductions in housing growth do not appear to be consistent with their aspirations in the LEP submission for economic growth. (The West of England LEP submission in September 2010 envisages 95,000 new jobs by 2030 and 3.4% cumulative annual growth in total GVA by 2020.)

**Change sought to** The Core Strategy should be amended to reflect the latest published household projections in  
**make sound:** accordance with PPS 3 para 33. The housing provision should be at least 18,500 dwellings for the plan period 2006 - 2026

**Representation (legal compliance):** no comment supplied

**Change sought to make legally compliant:** no comment supplied

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**Reference:** 248\5

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

**Representation** Paragraph 1.18: RS Implications/Justification for Policy DW1 criterion 4

**(soundness):** 3) The RPS response to this paragraph should be read in the context of our objection to Policy DW1 criterion 4, which seeks to protect the general extent of the Green Belt. When this CS is examined, the Inspector will be only too aware that the RS process established the case for Green Belt review, and remains very much a material consideration. Whilst BANES is intent on ignoring the RS despite it very clearly being a material consideration to which substantial weight should be attached (and for which it had full input), it should not be forgotten that the context for Green Belt review is established in RPG10 (September 2001). RPG10 still remains part of the Development Plan:

"Bristol, Bath, Bournemouth and Poole, Gloucester and Cheltenham are partly or wholly surrounded by Green Belt. Some growth relating to these PUAs appears to have been leaping the Green Belt to nearby commuter towns, leading to less sustainable patterns of development and travel. The purposes of Green Belt policy (as set out in PPG2) remain an essential part of RPG for the South West. However, the need to ensure that future patterns of development are more sustainable means that the boundaries of these Green Belts should be reviewed in the next round of structure plans."

4) RPG10 Policy SS4 still applies and it is not for BANES to adopt a different stance. Since BANES quite clearly has, it falls upon the CS to explain why it has sought to promote the unsustainable approach of leap-frogging the Green Belt as rehearsed above. The implications of the revocation of RSs could not be felt more strongly anywhere in the Country than at Bristol. In the RSS Modifications, the Government proposed an overall growth of 80,500 homes. This focused on 51,000 homes in the urban area (Bristol City and South Gloucestershire combined) and 29,500 homes in the Green Belt (8,000 in BANES). The latest versions of each of the four unitary authorities commits to 43,500 homes at Bristol, none of which are in BANES. In its submission Core Strategy, South Gloucestershire is still committed to Green Belt development at Bristol (2,000 homes west of the M32) as part of its obligation to deliver sustainable growth at Bristol. Evidently there is little in the way of joined up thinking if BANES is so at



odds with its neighbouring authority on a matter of critical importance.

5) To suggest that there is not a case for exceptional circumstances for reviewing the Green Belt is at odds with the development plan and the CS fails to provide any justification for this stance and/or review the negative consequences.

6) As the RS observes, the West of England HMA exhibits many of the characteristics of a city-region. Bristol City would perform as the key regional economic driver for the region, with Bath playing a complementary role. Reflecting the importance of the HMA to the future growth prospects of the region and employment, the West of England HMA was required to provide at least 137,950 homes over the plan period until 2026 with 21,300 apportioned to BANES. The commentary, and that of the West of England Vision, is at odds with BANES' assertion at paragraph 1.27 that Bath (and Bath alone) is the economic driver for this District. If that is right, the CS should demonstrate how little the district is affected by Bristol and why the policies ignore the growth requirements of the City.

7) Paragraph 2.36 of the December 2009 Spatial Options Paper sets out that the strategy seeks to make sure that most new housing and economic development is focused on the large urban areas of Bath and Bristol:

"The main reason for this is to help reduce the need to travel, particularly by car as these urban areas are the main centres for jobs, services and facilities and the locations best served by public transport". There is no clear rationale why this position has changed. It is a well established position and BANES can not possibly contend that the above statement is no longer relevant or applicable. The statement submitted by BANES to Matter 4/1 West of England HMA Sub-Regional Strategy at the 2007 EIP (paragraph 39) agreed that, "Whilst the strategic Green Belt review suggests that areas of search defined urban extensions most strongly serve Green Belt purposes, the overall objectives and sustainability benefits of the West of England strategy are considered to take priority eg regeneration of south Bristol. SSA work undertaken by BANES highlights harm to the Green Belt purposes but also the overall sustainability benefits which justified the urban extensions search areas proposed and therefore modifications to the general extent of the Green Belt".

8) Policy DW1 is unsound on the grounds that the departure from the SW RS and the departure from the Council's original stance on what constitutes sustainable development have not been adequately justified. The failure to provide the necessary number of new homes to meet emerging need also means that the Core Strategy will fail to comply with what is still national policy as set out in PPS3 to provide everyone with the opportunity of living in decent a home, which they can afford, in community where they want to live.

9) Paragraph 1.18 refers to account being taken of the District's functional relationship with neighbouring authorities. This is the only reference in the entire CS to such. Having trawled the evidence base, there is no evidence whatsoever that this has been the case. It is wholly wrong and fundamentally misleading to suggest it has. Paragraph 1.25 does nothing to suggest that any account of neighbouring strategies have been considered.

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

Options stage and its latest publication version.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 318\3

**Respondent:** MOD

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

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

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

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 1.19

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**Reference:** 147\4

**Respondent:** Bath Green Party

**Representation** PPS1 must be the primary driver "KEY PLANNING OBJECTIVES . To deliver sustainable development, and  
**(soundness):** in doing so a full and appropriate response on climate change" and this overrides the earlier RSS. More and every effort must be made to fill empty properties before building more. Innovative ways must be found to maximise occupancy in existing housing to reduce emissions of greenhouse gases. Specific policies for student housing have not been included and need to be.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 180\5

**Respondent:** J S Bloor Ltd

**Representation** Paragraph 1.19 refers to the detailed bottom up assessment of the capacity of the District's settlements  
**(soundness):** which has been undertaken. The assessment has included identifying suitable and deliverable development sites, having regard to the environmental constraints including the potential flood risk and assessing the appropriate mix of land uses and density. The SHLAA identifies only 11,289 dwellings which are available, suitable and deliverable. The density assumptions in the SHLAA appear to be based on higher densities that would be considered undesirable, now given that PPS 3 published in June removed the minimum density. Consequently, if densities were reduced on some sites there would be a need for more land to be made available to meet even the Councils housing figure of 11,000 dwellings in the plan period without even considering the higher housing figure from the latest 2008 based household projections. The recent PPG13 will also affect density assumptions. The deliverability of some sites included in the SHLAA is also questioned, if they are reliant on public sector funding coming forward e.g. Bath Central Area and Western Riverside where £27.6 million of public investment will be needed to ensure that the key infrastructure schemes are addressed.

**Change sought to make sound:** The Core Strategy should be amended to reflect the latest published household projections in accordance with PPS 3 paragraph 33. Sites within the SHLAA should be reconsidered in view of the public sector investment required to deliver those sites. Density assumptions of sites should be reconsidered, this will lead to more sites being needed to meet the existing figure in the Core Strategy and an even greater of number of

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 1.21

**Reference:** 265\22

**Respondent:** Bath Heritage Watchdog

**Representation** Paragraph 1.21 Emphasis is placed on Bath being a World Heritage Site, and therefore the whole city is **(soundness):** a "heritage asset" as defined by PPS5, but only parts of the city are covered by Conservation Areas and the legal protection derived from that designation, and Permitted Development rights remain outside them. So in that remainder, demolition of a building or felling trees that might be important in a view, or breaking a valued roofline with dormer windows could legally take place without seeking permission, to the detriment of the World Heritage Site. Proper protection of the heritage asset will only be possible if the conservation areas are extended to the WHS boundary or suitable Article 4 directives withdraw permitted developments. The council has approved the replacement of a Site of Special Scientific Interest (Newbridge) with a car park, which makes a mockery of claims to have properly assessed habitats.

**Change sought to make sound:** Include a commitment to extend Conservation Area boundaries to cover the entire World Heritage Site of Bath, or a city-wide Article 4 directive and thus afford the protection implicit in PPS5. Abandon the commitment to the Transport Package (see also comment on 1C Objective 7) to preserve a natural habitat.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 821\9

**Respondent:** Cam Valley Wildlife Group

**Representation** In Section 1c, 1.21, the District is described as having a rich and diverse biodiversity resource, but the **(soundness):** 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:**

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**Reference:** 821\17

**Respondent:** Cam Valley Wildlife Group

**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:**

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**Reference:** 821\18

**Respondent:** Cam Valley Wildlife Group

**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-resourced 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 no 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 be 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 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 matters 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:**

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**Reference:** 821\19

**Respondent:** Cam Valley Wildlife Group

**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:**

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**Reference:** 821\22

**Respondent:** Cam Valley Wildlife Group

**Representation** Sufficient information needs to be provided regarding the matters about which we are concerned in  
**(soundness):** 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:**

**Plan Reference:** Paragraph 1.22

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**Reference:** 188\9

**Respondent:** Freshford Parish Council

**Representation** Because no reference has been made to the input of Parish Plans to this Strategy. In the period of  
**(soundness):** creation of the Strategy substantial voluntary effort and expertise has been directed in many parishes to the creation and completion of Parish Plans, (Which equate to Neighbourhood or Community Plans) and this work has been encouraged by both Local and Central Government. Parish Plans represent the views and aspirations of rural communities and we understand that they were considered by the local authority as most relevant to, and therefore being taken account in, the creation of the Core Strategy. It would therefore render the Strategy more sound to include reference to their specific value and thereby obviate any implication that the efforts of the rural communities represented by these Plans have not been given due weight.

**Change sought to** The following entry would overcome the unsoundness detailed in 6b. In Page 18, 1D 1.22 After 'as well  
**make sound:** as parish and town councils' insert ' Parish Plans were also taken fully into account'.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 1.23

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**Reference:** 180\6

**Respondent:** J S Bloor Ltd

**Representation** The Core Strategy is unsound as the Council states in paragraph 1.23 that it has assessed the post  
**(soundness):** recession likely need for new housing both market and affordable housing over the plan period. Whilst the Council have correctly looked the implications of projected population changes arising from births and deaths and increasing life expectancy, the likely housing requirement this entails including the decline in average household size; what is at issue is that the Council have then looked at the need for housing generated from economic growth and based on this a lower housing figure is included in the Core Strategy.

The Roger Tym and Partners Report "Business Growth and Employment Land Update "Revised June 2010 states in paragraph 1.2 that the Council has taken the opportunity to revise the emerging RSS employment target of 21,000 net additional jobs for BANES over the plan period 2006 – 2026 because of the Coalition Government's intention to abolish the RSS, and secondly that the recession has made these targets unrealistic. The Core Strategy should take a more long term view rather than basing its

assumptions on the recent years.

The housing target should not be focussed on the short term i.e. what has happened in the last 2 years. The amount of housing growth affects growth in the economy. Latest figures indicate that the trend GVA figure is 2.25%, evidence indicates that there is no reason why a full economic recovery is not possible. The evidence from the SWRDA does not point to restricted potential in growth, consequently it is important to plan for full recovery. SWRDA evidence points to SW growth patterns after the recession for future growth between full recovery to recovery with loss. Restricted potential is not envisaged, this is would occur if recovery was severely constrained as a result of the implications of the recession.

If a low level were achieved then this could be as a result of the shortage of housing. Forecasts need to build in aspiration as well as other factors such as the demography, climate change, energy and technology change. RDA forecasts for 2015 – 2030 suggest that GVA average change + 2.4% compared to + 3.2% in 1995 – 2005. GVA per head is + 1.5% compared to 2.6% in 1995 - 2005. Employment (FTEs) is +1.1% compared with +1.8% where as productivity is +1.3% compared to 1.4%.

It is not clear why the Council believe that growth will be significantly lower in future. The Council need to explain why the future will be radically different from the past and address the implications in terms of the affect on investment in the local economy. Even if the Council believe that the economic forecasts are low now, it should plan for improvement. The implications of planning for lower levels of growth are that only low levels will be achieved. A lower housing requirement will not assist in meeting housing need. The SHMA ( June 2009) states that there is already a backlog of need and the total net housing need for BANES for the period 2009 – 2021 is 847 per annum – this equates to 10,164 dwellings for those in housing need i.e. for social rented housing and intermediate housing for only 12 years of the plan period. The Core Strategy provision of 11,000 dwellings is for the 20 year period for all types of housing. The SHMA concluded that there is an overwhelming very high housing need, in relation both to household growth and in relation to likely total future supply and the continuation of current policies will not be sufficient to meet even a significant proportion of the housing need identified in the SHMA.

The Core Strategy is unsound as it has reduced the housing requirement based on lower economic projections. Over the life of the Core Strategy it is inevitable that the economic climate will change, consequently the Core Strategy should be prepared so as to enable appropriate levels of housing provision to occur over the lifetime of the Plan and for it to be monitored accordingly.

**Change sought to make sound:** The Core Strategy should be amended to reflect the latest published household projections in accordance with PPS 3 paragraph 33 and taking into account evidence of housing need in accordance with PPS 3. The spatial strategy for BANES should be revised to reflect the need to provide for additional dwellings in accordance with the latest 2008 based household projections. The spatial vision for Keynsham in particular should be amended to include the opportunities for development at south west Keynsham.

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not in general conformity with the development plan as set out in PPS 12 paragraph 4.50 i.e. it should conform generally to the Regional Spatial Strategy. The Core Strategy is not legally compliant as it fails in to make adequate provision for housing needs during the plan period. It does not conform to latest government guidance in terms of the latest evidence base for the SW RSS or the latest DCLG 2008 based household projections. The Councils own Strategic Housing Market Assessment indicate that there is a very high housing need, both in household growth and in relation to likely total future supply.

**Change sought to make legally compliant:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections and evidence of housing need. The housing figures for the plan period should be increased to at least 18,500 dwellings

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**Reference:** 248\6

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



**Representation** Paragraph 1.23: Development Need/Justification for Policy DW1 criterion 2

**(soundness):** 10)The RPS response to this paragraph should be read in the context of our objection to Policy DW1 criterion 2, which seeks to make provision for 8,700 jobs and 11,000 homes.

11)The Secretary of State has confirmed that local housing targets may be tested through the LDF process and local authorities will need to collect and use reliable information to justify housing policies and defend them at examination. The policy provisions of PPS3 (Housing) continue to apply, including the requirement that the planning system provides ‘a sufficient quantity of housing taking into account need and demand and seeking to improve choice.’ (paragraph 10). The starting point for the assessment of the overall housing requirement is Paragraph 33 of PPS3. To summarise:

“In determining the local, sub-regional and regional level of housing provision, Local Planning Authorities and Regional Planning Bodies, working together, should take into account:

- Evidence of current and future levels of need and demand for housing and affordability levels
- Local and sub-regional evidence of the availability of suitable land for housing
- The Government’s overall ambitions for affordability across the housing market, including the need to improve affordability and increase housing supply.
- A Sustainability Appraisal of the environmental, social and economic implications, including costs, benefits and risks of development.
- An assessment of the impact of development upon existing or planned infrastructure and of any new infrastructure required.”

12)It should be taken as read that RPS does not consider BANES has worked together with neighbouring authorities in producing its CS. Since it fails to recognise any issue or influence outside of its own boundaries then that is the only logical conclusion. Taking each subsequent point in turn:  
Evidence of current and future levels of need and demand for housing and affordability levels

13)The need for 21,300 homes in BANES proposed in the RS reflects the outcome of a lengthy public examination into the rate of household formation in the sub-region and recognition of its importance of the economy. The apportionment of this number of homes to BANES reflected what was considered at the time as a sustainable number for the district, while also addressing housing need and demand.

14)The Spatial Options Paper sought to make provision for 15,500 new homes in accordance with the draft Regional Spatial Strategy (not the RSS Modifications). Paragraph 2.29 of the Spatial Options Paper acknowledged that “if this level of housing is not provided then it will have serious implications, preventing some people having access to a decent home, making housing less affordable and in the long term damaging the local economy by reducing labour supply and mobility”. RPS fully supports this statement and does not believe anything has changed in the space of 12 months. BANES is now proposing to build 11,000 homes and it can only be assumed that it is satisfied with the outcome it describes above. The proposed requirement of 11,000 homes is inadequate to address need and demand and the above consequences are inevitable. The CS is not based on a credible evidence base to justify setting a lower requirement.

15)A significant wealth of evidence was presented to the EiP Panel in relation to the necessary levels of housing growth required to support growth forecasts and population projections. The EiP Panel made clear that the evidence supporting an increase in the region of 23,000 homes per annum to 28,000 homes per annum was soundly based. That figure is based on 2003 population projections and paragraph 2.36 of the Panel Report makes clear that the Panel “find it difficult to understand what further evidence would be required to justify an adjustment to provision”. The evidence before the Panel was compelling.

16)The Panel further identified at paragraph 4.1.39 that the deficiency in the West of England HMA is largely due to the refusal of the Regional Assembly to recognise and plan for the consequences of the new household formation rates. The Panel goes on to suggest at paragraph 4.1.41 that the balance of the deficiency should be reallocated towards the SSCT areas in order to reflect the main strategic thrust of the draft RS.

17)Paragraph 2.84 of the Spatial Options Paper states that the strategic housing market assessment (SHMA) shows there is a need for 116% affordable housing across the district ie affordable housing need is greater than the overall housing target of the draft RS. It is little wonder therefore that the RSS Panel Report and Proposed Modifications sought to increase the overall strategic housing requirement in BANES. Although a figure of 21,300 homes as set out in the Proposed Modifications would not provide enough housing to meet that need in full, it would go much further in providing affordable homes for local people during the plan period. By failing to plan for an adequate level of housing

growth the Council has already committed itself to the serious implications as set out in Paragraph 2.29 of the Spatial Options.

18) Paragraph 2.84 identifies an affordable housing need of 17,980 homes. If an average rate of 35% of all new housing being affordable is applied to the strategic requirement of 11,000 homes, then 3,850 homes could be delivered under the terms of the draft RSS. Against the 21,300 figure in the Proposed Modifications and under the same scenario 7,455 homes could be achieved. That is a difference of over 3,500 affordable homes. The Council has not made clear why it would not wish to pursue a strategy that could deliver an additional 3,500 affordable homes. There is no rationale for failing to want to meet this requirement when even if the RSS Modifications figures were adhered to, there would still be a shortfall of over 10,000 affordable homes. As the SA rightly acknowledges, there is greater scope to achieve greater provision of affordable housing on larger sites such as the urban extensions at the SSCTs than there would be in smaller developments in the rural areas. Those affordable homes would be in areas of most need; ie at the SSCT.

19) The SHMA states at paragraph 7.4.5 that, "When the CLG household projections are revised they will incorporate more recent ONS population estimates and projections which incorporate higher migration numbers and assumptions than previously. Thus they will certainly be higher. There is some debate about whether the migration assumptions will in fact be too high, allowing for changing Home Office rules and the abating of the flows from new EU member states. It is likely that forecasts for household numbers contained within the model will be a reasonable comparator for the new household projections with a lower (and arguably more realistic) migration assumption."

20) The SHMA foresaw what might arise out of the latest projections and provided a clear position. BANES has not sought to discredit the SHMA. The SHMA did not limit itself to the crude analysis of simply providing enough homes to ensure a balance with the expected number of jobs arising (based on an unambitious assumption for economic growth). If the SHMA is right then its own model advocates an annual net household growth of 731 in BANES, equivalent to 15,000 households over a 20 year period. This figure is not dissimilar to the latest CLG household projections. It is important to have regard to the fact that this is a BANES centric forecast. It is based on trend based projections; it does not therefore provide any analysis relating to growth of Bristol and explore household formation from this source (since BANES has never made a contribution to Bristol's growth). It is worth considering that is precisely what the RS was seeking to achieve, and when the 8,000 homes identified for Bristol in BANES is added to the equation, there is nothing to suggest that the 21,300 figure was anything other than reasonable.

21) It is not clear on what possible basis the Council does not think that a higher rate of growth is either suitable or achievable, or could be planned for. For the reason set out in this submission, RPS contends that a higher rate of growth is (a) necessary and (b) entirely achievable.

22) The council's justification for this lower level of provision is driven by two key reports: the Business Growth and Employment Land Update by Roger Tym and Partners (RTP), and the BANES Future Housing Growth Requirements to 2026 by Keith Woodhead. These documents have been used to justify a housing figure of 11,000 homes based upon 8,700 new jobs being created. The provision for just 8,700 new jobs is unduly pessimistic for a district such as BANES which is experiencing high levels of demand. This level is the lower level of the employment growth projected by RTP and Keith Woodhead.

23) It is useful to note in this respect that the Secretary of State in the proposed changes to the RS (supported by the Regional Economic Strategy) concluded that 592,460 additional dwellings were needed over the period to 2026 to support the plan's ambition to achieve a 3.2% level of economic growth per annum across the region. This level of economic growth depended on providing for higher levels of economic-led migration (see paragraph 2.19 on the Panel's report of the Examination in Public) and this required houses to be built in areas of high demand. The job growth figure associated with securing a 3.2% increase in growth was 465,000 jobs – a target far higher than the number of workers. Because BANES has an ability to support higher economic growth as part of the West of England growth area, it was apportioned a higher level of housing. The RTP report makes the same observation when it states in paragraph 4.2 that future job growth is partly dependent on planning policy and housing land supply.

24) Keith Woodhead's report for BANES estimates between 8,700 and 11,300 jobs being created. He then uses a ratio of 1.33 of a dwelling needed for each new job created (see paragraph 5.1.4 of the Woodhead report). Using this ratio and assuming a jobs growth rate of 10,000 (thus lying between the estimated ranges) this alone would generate the need for 13,300 dwellings. To this figure must be

added additional allowances to account for the unmet needs of existing residents and those households moving to the area who may not be economically active or who will be commuters. Using the lower jobs growth figure to inform the housing need requirements is an unduly pessimistic scenario. To provide for housing that meets the needs only of new job formation is to take only an element of the issues that result in household growth and turn it into policy.

25) It is important to express a degree of caution regarding the Oxford Econometrics advice. It is important to consider the brief for that study; certainly it reflects on the economic downturn but at no point does it state that full market recovery cannot be achieved. It is a trend based analysis and does not respond to what could be achieved. It is not clear why BANES does not wish to aspire and facilitate greater economic growth and prosperity. An exercise in restraint is hardly likely to assist a flourishing market recovery. It is important to ask the question why BANES is content only to plan for moderate growth. The answer it seems is quite simple; that it is not confident the supply to achieve it exists and the implications for this CS would be to acknowledge that exceptional circumstances exist to warrant development in the Green Belt.

26) Given that the Keith Woodhead report acknowledges that the BANES proposed housing requirement will fail to address the affordable housing need of 850 homes per year as identified in the SHMA, and because the SHMA fails to calculate the extent of market need, the housing requirement is wholly unsatisfactory. If BANES is now retreating from an economic growth agenda then this should be made more explicit in the Core Strategy as this will have an important bearing on the Local Enterprise Partnership and its growth agenda for the West of England.

27) The strategy suggests that the Council is planning for recession rather than utilising the planning tools available to it to promote growth and support the regional economy. If BANES is now preparing to close its borders the Core Strategy should be clear about this so that investment can flow elsewhere and the Local Enterprise Partnership made aware. Achieving a 3.2% level of growth may be regarded by some as unrealistic but the livelihoods of many people depend upon concerted action by the public and private sector to try and achieve this. The pursuit of ambitious goals should not be confined to the setting of environmental targets alone.

28) It is a 20 year plan and it is inevitable that there will be periods of economic prosperity and slowdown throughout that period. It is not for this Core Strategy to react to a current economic downturn as justification for providing a lower rate of growth. Throughout the preparation of the RSS, it has been recognised that there are significant lead in times associated with the development of the urban extension sites. There is a natural phasing to be applied to development in these locations given the extensive amount of preparatory work and consultation that needs to go into making a successful place. The developments in south east Bristol and on the edge of Bath are still a number of years away from fruition and are therefore unaffected by the current climate. It is therefore completely irrelevant to refer to the current economic recession as a reason for restricting the quantum of growth in those locations. The critical matter that affects the amount of development that could be achieved by the end of the Core Strategy period is the planning policy context set out in this Core Strategy; it has to be more ambitious than present.

29) The West of England Local Enterprise Partnership Proposal to the Secretaries of State for BIS and CLG (September 2010) refers to GVA growth of 3.4% up to 2020 which is equivalent to highest recent Oxford Economics forecast. The document relates to the entire West of England area. How does the Council justify its CS reliance on a rate of growth much lower than the projected rate of the West of England? There is no reason whatsoever that could possibly suggest that a lower rate of growth is applicable to BANES (ie that other parts of the West of England sub-region have a comparatively much higher rate of economic growth). BANES has as much a role to play in delivering 3.4% growth as any other of the unitary authorities.

30) The decision to plan against an assumed low level economic growth is unduly negative. The recent publication Cities Outlook 2011 (Centre for Cities) appended to this submission identifies Bristol as one of the top five cities best placed for a private sector-led recovery. It is one of the least affected cities arising from the comprehensive spending review/welfare cuts, and if the report is read as a whole then there is little that suggests full market recovery is not possible. Bristol will hopefully continue to thrive despite the constraints inflicted by the four authorities in the West of England. BANES and its neighbouring authorities would do well to heed the advice in the foreword of the study:

“The greatest advances in improving city life for residents are created by visionaries who are able to see and plan beyond organisational boundaries. Understanding where you are today, with respect to your

peers and competitors, is an essential first step towards setting and achieving goals - this report helps provide this valuable information.” Stephen Leonard, Chief Executive, IBM UK and Ireland

31) There is no analysis of the negative consequences should the economy recover faster than BANES anticipates, or that the overall growth target will not meet housing need. There is no reference to negative social, economic and environmental consequences (such as increased in-commuting and increasing levels of overcrowding, sharing and concealed households). Notably the Centre for Cities research alludes to the fact that cities such as Bristol are well positioned to support national growth by building on their diverse industrial base and high skills levels. There is no doubt that any attempts on restricting the supply of housing will have negative consequences for the City, the sub-region and beyond. BANES should be obliged to consider these consequences and not simply turn its back on them. It has a clear role in delivering growth in Bristol, that will be of benefit to wider BANES prosperity.

32) The other element to consider is the most recent CLG household projections. The 2008 based projection shows an increase of 16,000 households in the period 2006-2026. This represents a decrease from the 2006 based projection which had indicated an increase of 19,000 households for the same period. Despite the decrease, this still indicates a level of provision that is significantly above the 11,000 target.

33) The Migration Statistics for 2009 (Migration Statistic Quarterly Report: ONS, November 2010), published in November 2010, shows that fewer people left the UK than arrived to live (an estimated 368,000 people emigrated from the UK in 2009, compared to an estimated 567,000 people arriving). This counters the argument that district housing requirements can be reduced because the impact of the European recession will result in fewer new in-migrants. The argument assumed that out-migration from the UK would continue at the same rate as before, when in many respects, the UK continues to be a relatively attractive destination for many and/or opportunities for work contract in the rest of Europe.

34) Section 5 of the Migration Statistic Quarterly Report: ONS, November 2010 shows that in the year 2009-2010 the South West is experiencing the largest net inflow of people (19,200) after the South East region (21,900). The South East region is a populous and economically dynamic region where most population and household formation is internally generated. By contrast it has historically been the case that the South West's internal population growth has largely remained static and in-migration has been an important component of household formation in the region and providing its labour supply. It is also important to note that planning policies constraining growth across the South West region will have probably dampened levels of in-migration, population and household growth than would otherwise have been the case.

35) One should conclude from this that these long term migration trends can be expected to continue. This will result in greater housing stress within BANES unless a higher housing requirement is identified.

36) Planning for lower levels of housing delivery than indicated by the RS and the household projections will not support economic recovery. Local authorities need to accept their responsibilities by facing-up to the housing supply crisis, and begin planning sensibly to meet housing need and demand. Planning is about the long term. It is unsound to base the district's 20 year plan on today's low levels of activity. This CS Policy is to plan for recession and to build recessionary assumptions into planning.

37) As the West of England SHMA observes in paragraph 2.8.1 “The WoE HMA is a relatively prosperous area with a diverse economic base. It needs to retain its population to contribute to the wider local economy and to ensure that lack of housing does not begin to cause labour shortages potentially threatening the competitiveness of the area. The growth of longer distance car commuting is ultimately unsustainable in its impact on the local environment and its contribution towards congestion. Future housing supply strategies need to recognise these wider impacts and seek to maximise completions within the existing stock and on new sites within the sub-region close to economic centres.”

38) It is regrettable that this CS cannot set more ambitious targets for growth that it may or may not deliver. As the CS seems to suggest, it wants to facilitate growth providing of course that it is able to protect the Green Belt. It can only realistically do this by restricting the headline figure and constraining supply. That would seem the only logical reason why a more ambitious housing and economic growth strategy is not advanced in this Core Strategy.

Local and sub-regional evidence of the availability of suitable land for housing

39) The approach to establishing the strategic housing requirement is in part a consequence of a ‘

bottom-up assessment' of potential supply. The SHLAA identifies developable land for just over 11,000 homes. The available supply is far greater than that which results in an overall requirement of 11,000 homes. In respect of CSP and Key Properties specific interests at Hicks Gate there is no evidence, whether it is contained within the SHLAA or the SA why this location cannot be considered as a sustainable location for growth. It has simply been ignored in pursuit of political objectives and nonsensical protection of the Green Belt. In respect of the SHLAA, the Key Findings section simply states (in relation to SE Bristol) that, "The availability, suitability and deliverability of each area was evaluated in the Core Strategy Options document (October, 2009) and supporting Information Paper. The final housing potential (in terms of suitability and deliverability by 2026) of each site had yet to be determined."

40) It is not clear why the SHLAA process has simply not bothered to appraise these locations in more detail. The answer it seems is obvious; BANES has already identified the location as sustainable in submissions to the RS EiP, the SA recognises it as such and the SHLAA acknowledges that it has previously been acknowledged as suitable, achievable and deliverable. The SHLAA ignores it for the simple reason the Council has no intention of having regard to it. That is a wholly unsound, unjustified and ineffective stance.

41) BANES is fixated on the notion that it can only plan for what it already knows it has; if the supply is so certain then it is questionable whether there is any value in having a Core Strategy insofar as it relates to housing (and employment) land. Evidently BANES has little intention of facilitating growth beyond known supply at 2010. It cannot be sound to establish a housing requirement so low just to establish a five year land supply; it goes against all the requirements of PPS3 and smacks of desperation. The Government's overall ambitions for affordability across the housing market, including the need to improve affordability and increase housing supply.

42) Planning for the low number of homes proposed by the Core Strategy will contribute to restraining growth and increasing unemployment in the West of England housing market area. Neglecting the economic dimension and the links with housing would mean attaching little weight to the Government's growth agenda, as set out in the HM Treasury and Department for Business Innovation and Skills document: The Path to Strong, Sustainable and Balanced Growth (HM Treasury/BIS, November 2010). The document cites the need for a planning regime that supports growth and sustainable development and that enables an increased supply of housing to meet the nation's needs.

43) At no stage has this government suggested that the proposed changes are intended to act as a brake to the delivery of homes. The intention is quite the contrary, albeit the West of England authorities seemingly intend to interpret it differently. A Sustainability Appraisal of the environmental, social and economic implications, including costs, benefits and risks of development.

44) The SA, insofar as it relates to the overall level of housing states, "Development of the Spatial Strategy is explained in paras 1.17-1.24 which briefly sets out the context for the level of development proposed. A fuller explanation (with links to the relevant evidence) will be set out in a supporting Information Paper."

45) It is regrettable that the information is not available to comment on. The SA goes on to state, "As a lower amount of housing growth is proposed in this district strategy, compared with the previous housing growth options considered for the district strategy, less affordable housing could be delivered by this strategy compared to the previous options, however, this strategy is based on an evidence base predicting need and Policy CP9 aims to deliver a greater rate of affordable housing delivery than has been delivered in the district over previous years."

46) This is the sum total of analysis of the 11,000 homes figure. It completely fails to examine the consequences of under provision and the requirements of PPS3. The fact that the 11,000 homes represents a higher annual completion rate is hardly cause for celebration when it will so fundamentally fail to meet the needs of existing and future households, and the West of England economy. The SA insofar as it relates to economic development is equally crude. The fact that the BANES intends to build more than one home and provide for more than one job is enough to award it a positive score. The SA is crude to the extent that it has no value as a tool to determine whether the CS is sound insofar as it relates to the overall strategy for jobs and homes.

47) In respect of the SA update insofar as it relates to the urban extension, RPS is pleased to see that the SA has sought to respond to some of the issues raised during the consultation on the Spatial Options Paper. RPS notes in particular the content of Annex E of the SA; whilst the SA is hamstrung by the constraints imposed by the CS Policy for limited aspiration and growth, it still provides a

commentary of the urban extension options. The table below reproduces the comments of the SA as it relates to the urban extension promoted by RPS at Hicks Gate on behalf of CSP and Key Properties.

#### Positive Outcomes & Negative Outcomes

The urban extensions to the South East of Bristol would benefit from access to new and proposed facilities within south Bristol. Development of the Hicks Gate option would reduce the gap between Keynsham and Bristol and compromise the greenbelt function that the area is currently providing. The Hicks Gate area has good access to Bristol facilities and services due to good public transport accessibility however, the site is located near to peripheral land uses such as the Park and Ride and a retail park at Brislington. However, an urban extension at Hicks Gate could provide an 'anchor' for some of the surrounding peripheral land uses and create a sense of community in this area.

Both potential urban extensions could potentially provide a range of facilities and services although the Hicks Gate site would need to be developed comprehensively with land in the Bristol City administrative area in order to provide sufficient capacity. All of the urban extension options would result in the development of Greenfield land and the loss of soil resources.

Both options would have the potential to deliver affordable housing.

Both options have the potential to contribute to the economy of Bristol.

The Hicks Gate option could provide employment development, which could help to reduce the distances travelled by Keynsham residents for work.

There are some nature conservation features within the Hicks Gate area, including a SNCI bordering the site and potentially important hedgerows on the site. An urban extension at Hicks Gate could improve the management of the SNCI.

According to consultation responses, no significant archaeological potential has so far been identified at the Hicks Gate site. Listed Buildings and registered Park and Gardens on the site have the potential to form a key part of a green infrastructure network and the overall context of an urban extension, ensuring their integration and protection.

Large scale developments such as urban extensions offer significant benefits over smaller scale developments in respect of local energy sources and district energy infrastructure, and as such offer greater sustainability benefits in this respect.

Another benefit of urban extensions is that they allow a comprehensive community to be created, which is well planned and with adequate infrastructure. When designed and planned well, urban extensions can provide benefits to surrounding neighbourhoods. A challenge to successful urban extensions is achieving cohesion between existing and new communities.

48)The SA concludes, "Although the Spatial Strategy proposes employment development in Keynsham, it does not provide any additional employment opportunities to the South East of Bristol which might have benefited residents of Keynsham and further reduced distances travelled for work. Not creating an urban extension in the Hicks Gate area would not improve this approach into Bristol or contribute to creating a sense of place or community for this area."

49)All of the possible benefits of development at Hicks Gate are offset by one factor, and one factor alone: Green Belt. Of course, there are other factors that mitigate against the development such as the exceptional lack of ambition in relation to economic growth that is fundamentally at odds with the aspirations of the West of England LEP.

50)For the reasons set out in the evidence base submission, the continued protection of the Green Belt in this location has no justification whatsoever. An assessment of the impact of development upon existing or planned infrastructure and of any new infrastructure required.

51)Since there is no strategic development in the CS it is difficult to gauge whether the planned infrastructure is sufficient to meet the target. The fact of the matter is that such is the strength of objection to the growth ambitions of the Council that it would be an irrelevance to consider the likely infrastructure requirements arising from the current policy position.

**Change sought to make sound:** 1)Policy DW1 goes to the heart of this CS. RPS considers it to be so fundamentally unsound that the only course of action is to abandon the plan and start again with a clear direction to deliver ambitious growth that meets the needs of BANES and contributes to wider sub-regional goals.

2)Essentially, this means planning for a higher rate of growth; that is 21,300 homes as set out in the RSS Modifications but seeks to make provision for that in a flexible and transparent way. It also means creating the context for ambitious economic growth in line with the West of England LEP objectives. The LEP predicts GCA growth in the West of England of 3.4% (by 2020); this Core Strategy prefers to plan for 1.6%. Not only does this show a marked lack of ambition at odds with its own vision and objectives, but the examination of this CS must focus on the wider impact at a sub-regional level and the associated negative social and economic consequences.

3)To do this requires the CS to recognise the need for sustainable urban extensions to the cities of Bristol and Bath. As it stands there is a major policy omission. RPS is promoting the land at Hicks Gate as a sustainable urban extension to Bristol. To that end, RPS submits a separate 'Policy Omission' Paper (below) that considers the role of Hicks Gate and evidence base that underpins it. The 'evidence base' in the form of a Statement of Delivery was submitted at the time of the Spatial Options consultation in December 2009; RPS has confirmed with Council Officers that this evidence can be taken forward to examination without the need to resubmit.

4)The paper below also seeks to appraise the Sustainability Appraisal, comparing the SA at the Spatial Options stage and its latest publication version.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 1.24

**Reference:** 180\7

**Respondent:** J S Bloor Ltd

**Representation** 6b Why you consider the Core Strategy is unsound:

**(soundness):** The Core Strategy is unsound as it is not the most appropriate strategy when considered against the reasonable alternatives. The latest DCLG household projections confirm the trend for higher levels of housing, and the Strategic Housing Needs Assessment also confirms the need for provision for a higher number of dwellings in the plan period. The strategy appears to be based on the short term economic situation i.e. one economic cycle rather than considering the implications of the population growth and household growth for the plan period. Over the life of the Core Strategy it is inevitable that the economic climate will change, consequently the Core Strategy should be prepared so as to enable appropriate levels of housing provision to occur over the lifetime of the Plan and for it to be monitored accordingly. The Core Strategy will fail to meet housing needs and respond to demographic and social changes.

Failure to meet housing needs will increase those in need of affordable housing and that those who do work in parts of the authority e.g. Bath, will have to travel further, increasing commuting and congestion. The lack of housing provision will not support the economic development objectives and increase labour supply. Paragraph 1.24 acknowledges that Bath has one of the widest house price earnings ratios outside London, but affordability varies across the District. The SHMA states that there is a high level of need for affordable housing which is not being met through existing policies and levels of delivery. Historically, the supply of housing in the South West has been lagging behind demographically based need/demand and the affordability of housing has been worsening. No where is this more evident than in BANES, where the housing provision in the adopted Local Plan has fallen short of the that envisaged, with an over reliance on brownfield sites which have failed to deliver during the economic boom. Affordability has worsened in the authority.

The SHMA evidence refers to the overwhelming message is one of very high housing need, in relation both to household growth and in relation to likely future supply. It concluded that current policies will not be sufficient to meet even a significant proportion of the housing need identified in this SHMA. There is a high demand for family housing which is not being matched by recent supply, which in some

areas has emphasised flats and smaller units. BANES has a lower number of detached houses, almost 30% terraced houses and 18% flats.

**Change sought to make sound:** The Core Strategy should be amended to reflect the latest published household projections in accordance with PPS 3 paragraph 33. The housing provision should be at least 18,500 dwellings for the plan period 2006 – 2026 which will be able to deliver more affordable housing.

**Representation (legal compliance):** The Core Strategy is not in general conformity with the development plan as set out in PPS 12 paragraph 4.50 i.e. it should conform generally to the Regional Spatial Strategy. The Core Strategy is not legally compliant as it fails to make adequate provision for housing needs during the plan period. It does not conform to latest government guidance in terms of the latest evidence base for the SW RSS or the latest DCLG 2008 based household projections. The Councils own Strategic Housing Market Assessment indicate that there is a very high housing need, both in household growth and in relation to likely total future supply.

**Change sought to make legally compliant:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections. The housing figures for the plan period should be increased to at least 18,500 dwellings

#### Plan Reference: Paragraph 1.25

**Reference:** 180\8

**Respondent:** J S Bloor Ltd

**Representation (soundness):** The Core Strategy is unsound as the Council states in paragraph 1.25 that it has taken account of the sub-regional context. The spatial strategy must take account of the strategies and programmes of neighbouring authorities, especially the West of England.

The local authorities worked together to submit First Detailed Proposals for the West of England Joint Study Area to the South West Regional Assembly as Section 4 (4) authorities in 2005. This formed the basis of the housing figures in the Draft RSS as submitted in June 2006. Whilst to some extent joint working has continued through the West of England Partnership with the preparation of the Multi Area Agreement and the submission for the Local Enterprise Partnership; the issue is that the local authorities in determining the level of housing provision should take into account relevant local, subregional, regional and national policies and strategies i.e. PPS 3 paragraph 32 and also PPS 3 Bath and North East Somerset's Core Strategy – Publication Stage Representation Form paragraph 33.

However, if the housing provision of the local authorities in the West of England is examined, the shortfall for each local authority and the West of England is evident. The shortfall for BANES on the RSS dwelling figures is 10,300 dwellings and compared with the 2008 based household projections in the order of 6,000 dwellings.

Local Authority Core Strategy proposed housing figures RSS Proposed Changes 2008 based household projections

BANES	11,000	21,300	16,000
Bristol	26,400	36,500	72,000
South Glos	21,500	32,800	32,000
North Somerset	13,400	26,750	36,000
Total for West of England	72,300	117,350	156,000

It is the implications of the shortfall both in the local authority and the West of England in terms of housing need and the implications for the local economy that should be addressed. The West of England SHMA (June 2009) demonstrates the need for housing. The West of England HMA represents the largest concentration of business activity and employment in the South West region. One of the key messages in the SHMA is that there is a high level of need for affordable housing which is not being met through existing policies and levels of delivery. The SHMA states in the Executive Summary that migration is likely to continue at current levels but with migrants coming from outside the UK, households moving to the area from the UK are likely to be economically active. The Local



Enterprise Partnership (LEP) September 2010 sets out its priorities are, to facilitate the supply of readily available workforce and the skills that businesses need, to encourage the high levels of business start-up and growth of small businesses and, to facilitate new housing and community infrastructure. Within the priorities the LEP aim to promote the key growth sectors in the West of England, both nationally and abroad, to contribute to 3.4% cumulative annual growth in total GVA by 2020.

In constraining the levels of housing growth in BANES to 11,000 dwellings for the plan period this is inconsistent with the aspirational approach for economic growth in the LEP.

**Change sought to make sound:** The Core Strategy should be amended to reflect the latest published household projections in accordance with PPS 3 paragraph 33

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

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

**Change sought to make legally compliant:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections and evidence of housing need. The housing figures for the plan period should be increased to at least 18,500 dwellings

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**Reference:** 275\2

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

**Representation (soundness):** The Core Strategy is unsound as the Council states in paragraph 1.25 that it has taken account of the sub-regional context. The spatial strategy must take account of the strategies and programmes of neighbouring authorities, especially the West of England.

The local authorities worked together to submit First Detailed Proposals for the West of England Joint Study Area to the South West Regional Assembly as Section 4 (4) authorities in 2005. This formed the basis of the housing figures in the Draft RSS as submitted in June 2006. Whilst to some extent joint working has continued through the West of England Partnership with the preparation of the Multi Area Agreement and the submission for the Local Enterprise Partnership the issue is that the local Bath and North East Somerset's Core Strategy – Publication Stage Representation Form authorities in determining the level of housing provision should take into account relevant local, subregional, regional and national policies and strategies i.e. PPS 3 paragraph 32 and also PPS 3 paragraph 33.

However, if the housing provision of the local authorities in the West of England is examined, the shortfall for each local authority and the West of England is evident. The shortfall for BANES on the RSS dwelling figures is 10,300 dwellings and compared with the 2008 based household projections in the order of at least 6,000 dwellings.

Local Authority Core Strategy proposed housing figures RSS Proposed Changes 2008 based household projections

BANES 11,000 21,300 16,000

Bristol 26,400 36,500 72,000

South Glos 21,500 32,800 32,000

North Somerset 13,400 26,750 36,000

Total for West of England 72,300 117,350 156,000

It is the implications of the shortfall both in the local authority and the West of England in terms of housing need and the implications for the local economy that should be addressed. The West of England SHMA (June 2009) demonstrates the need for housing. The West of England HMA represents the largest concentration of business activity and employment in the South West region. One of the key messages in the SHMA is that there is a high level of need for affordable housing

which is not being met through existing policies and levels of delivery. The SHMA states in the Executive Summary that migration is likely to continue at current levels but with migrants coming from outside the UK, households moving to the area from the UK are likely to be economically active.

The Local Enterprise Partnership (LEP) September 2010 sets out its priorities as being :  
(i) to facilitate the supply of readily available workforce and the skills that businesses need,  
(ii) to encourage the high levels of business start-up and growth of small businesses and (iii) to facilitate new housing and community infrastructure. Within the priorities the LEP aim to promote the key growth sectors in the West of England, both nationally and abroad, to contribute to 3.4% cumulative annual growth in total Gross Value Added (GVA) by 2020.

**Change sought to make sound:** The Core Strategy should be amended to reflect the latest published household projections in accordance with PPS 3 paragraph 33

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not in general conformity with the development plan as set out in PPS 12 paragraph 4.50 i.e. it should conform generally to the Regional Spatial Strategy. The Core Strategy is not legally compliant as it fails to make adequate provision for housing needs during the plan period. It does not conform to latest government guidance in terms of the development plan and also taking into account the latest evidence base for the SW RSS. Neither does the Core Strategy take into account the latest DLG 2008 based household projections. The Council's own Strategic Housing Market Assessment indicates that there is a very high housing need, both in household growth and in relation to likely total future supply.

**Change sought to make legally compliant:** The Regional Spatial Strategy remains part of the development plan, despite the Coalition Government announcing that the RSS was to be abolished. The 6th July 2010 revocation of Regional Strategies was announced with immediate effect. The 6th July revocation decision was then subject to challenge in the Cala Homes (South) Ltd case. The effect of the Cala Homes decision was that the Regional Strategy as it stood on 5th July forms an ongoing part of the development plan. PINs Advice confirms that the RS is part of the development plan until legislation to formally repeal or revoke the RS is implemented. The Core Strategy should be consistent with the development plan and the latest national advice, which now includes the DCLG 2008 based household projections. In the South West the regional strategy remains part of the development plan and in this case that is RPG10 September 2001 which became the Interim RSS in 2004.

The Core Strategy does not conform to the Regional Spatial Strategy and no local justification is provided for the lack of conformity. The housing figures for the plan period should be increased to at least 18,500 dwellings.

#### Plan Reference: Paragraph 1.26

**Reference:** 180\9

**Respondent:** J S Bloor Ltd

**Representation (soundness):** The Core Strategy is unsound as the Council states in paragraph 1.26 that provision is made for 11,000 dwellings for the plan period. Whilst the strategy is to locate new development in the most sustainable locations, there is an over reliance on brownfield sites some of which have been included in the adopted Local Plan and failed to come forward in the local plan period. Bath and North East Somerset's Core Strategy – Publication Stage Representation Form This point has been made in detail in representation to Policy DW01 and in representations on the spatial vision.

Although there are acknowledged constraints in the district such as the AONB, it was considered through the preparation of the RSS that there was capacity to accommodate in the order of 21,300 dwellings in the plan period. This was consistent with the principles of sustainable development and for BANES included a review of the Green Belt which had been deemed necessary as long ago as in the first RPG10 in 1994. Circumstances have not changed since then and the long term trend is for an increasing population and a strategy based on sustainable growth. The necessary provision of new homes and also to fulfil the roles of the SSCTs in terms of their economic potential could not be met within the existing urban areas. Through the preparation of the RSS exceptional circumstances have been demonstrated. The RSS identified urban extensions as part of the most sustainable solution for delivering housing and other development. This requires changes to be made to the general extent of the Green Belt. An urban extension to Keynsham was identified.

**Change sought to make sound:** The Core Strategy should be amended to reflect the latest published household projections in accordance with PPS 3 paragraph 33 and taking into account the latest evidence of housing need.

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not consistent with the development plan. PPS12 paragraph 4.50 states that under the Planning and Compulsory Purchase Act 2004 S 20 (5) (a) an Inspector is charged with firstly checking whether the Core Strategy has complied with legislation. It is considered that for two reasons the Core Strategy is not legally compliant as it is not in general conformity with the development plan (i.e. the RS has now be re-instated as part of the development plan and will remain so until the Localism Bill is enacted – this is envisaged to be late in 2011) and secondly as it fails to take account of national policy in terms of PPS 3 paragraph 33, the Governments latest published household projections ( 2008 based published in Nov 2010) and evidence of current and future housing need as stated in the West of England Housing Market Assessment June 2009. The Councils own Strategic Housing Market Assessment indicate that there is a very high housing need, both in household growth and in relation to likely total future supply. It also fails to take account of the evidence base supporting the latest version of the RSS.

**Change sought to make legally compliant:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections and taking into account the evidence of housing need. The housing figures for the plan period should be increased to at least 18,500 dwellings

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**Reference:** 286\4

**Respondent:** Horseworld

**Representation (soundness):** Paragraph 1.26 of the Core Strategy states that the strategy will make a provision for around 11,000 new homes and 8,700 new jobs. This level of growth is proposed due to infrastructure deficiencies, environmental constraints and the results of the community engagement. The Core Strategy argues that that the level of growth equates with the future likely need for development and comments that the district's particular circumstances constrain the space available for development. It appears that the Council's principal aim in the Core Strategy is not to deliver housing and employment land to meet the needs of the District but to provide for significantly less land for housing than is generally accepted to be required based on desire to protect all Greenfield land from development.

The lack of provision of a viable quantum of housing land is ill-conceived and fails to have regard to the needs of the whole of the District. The strategy is unsound because it has not given due consideration to a reasonable alternative which would see some Greenfield development, best delivered by an urban extension at Whitchurch, to deliver the cumulative affordable and market housing needs of the district for the plan period. It is noted that the housing numbers proposed are 48% less than those recommended by the Secretary of State in the Proposed Changes (21,300) and 29% less than the housing figures proposed in the Stage 1 Draft RSS (15,500). The justification for this significant reduction in housing numbers is not sufficiently robust and does not have due regard to the pressing need to deliver more housing to reduce house price rises and deliver affordable housing for current and future residents.

The Core Strategy is unsound because it is not sufficiently justified and it is not effective in terms of its delivery of a strategy for providing sufficient numbers of new homes. Furthermore, it has discounted reasonable alternatives (as outlined the in RSS) without due consideration.

**Change sought to make sound:** Increase the housing supply for BANES to provide a reasonable amount of housing (market and affordable housing) to meet the needs of the district.

Housing numbers should be increased to at least the numbers proposed in the Draft RSS (15,500), and more realistically to the figure proposed in the SoS Proposed Changes (21,300).

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 1.27

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**Reference:** 117\2 S

**Respondent:** Priston Parish Council

**Representation 1.27** We greatly welcome the fact that no changes are proposed to the general extent of the Green Belt  
**(soundness):** around Bath.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 118\1 S

**Respondent:** Mrs J. Tinworth

**Representation** Protection of the Green belt surrounding Bath and therefore the protection of the World Heritage Site  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\23

**Respondent:** Bath Heritage Watchdog

**Representation** Paragraph 1.27. There is an immediate conflict between trying to address the volume of incommuting,  
**(soundness):** and the failure throughout the document to look over the border into Wiltshire. A considerable proportion of in-commuters live within a 12 mile radius to the east of Bath because there they can live in a nice house with garden for less than the cost of a small flat in Bath. Even if the economics are addressed, such people will not move because their quality of life is so much better.

**Change sought to** Recognise that Bath is not in a competitive position because its living costs, its traffic jams and its  
**make sound:** aversion to parking provision at places of work put Bath at a disadvantage compared to other nearby locations. Assuming that everything will be OK doesn't make it happen.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\24

**Respondent:** Bath Heritage Watchdog

**Representation** The other future problem overlooked is that attention has been paid to the possibility of securing MOD  
**(soundness):** sites for development, without considering what happens to the employees. The most likely relocation is to Abbey Wood, and the MOD will pay excess fares as part of the removals package (it is an MOD entitlement, so it can't be withheld), so several thousand MOD workers would suddenly become outcommuters. The railways barely cope with the last MOD migration, so most of the new tranche will commute by car, taking much of their spending power with them. This will offset much of the expectation for economic growth.

**Change sought to** Include a commitment to encourage the MOD to stay. The staff on average earn more than the people  
**make sound:** that are likely to replace them so retaining their jobs is more important to Bath's economy than securing their sites for redevelopment.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 265\25

**Respondent:** Bath Heritage Watchdog

**Representation** The fiction that office space has to be modern and is required in large amounts is addressed in 1C  
**(soundness):** Objective 3

**Change sought to make sound:** Reduce dependence on “smart growth” because history has shown that anything other than a wide spread of business sectors leaves vulnerabilities that can hit hard (hence in Bath the abundance of empty offices already built).

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 1.28

**Reference:** 180\10

**Respondent:** J S Bloor Ltd

**Representation (soundness):** The Core Strategy is unsound as the Council states in paragraph 1.28 that no changes are proposed to the Green Belt boundary at Keynsham, in the context of seeking to maintain the towns separate identity. Bath and North East Somerset’s Core Strategy – Publication Stage Representation Form The Draft RSS states that although the Green Belt will continue to maintain the separate identities of Bristol and Bath, it was necessary for the provision of new homes, and in order to fulfil the SSCT’s economic potential that could not be accommodated in the existing urban area; that the most sustainable solution was to provide for urban extensions to the SSCTs, including at locations that had been subject to a review of the Green Belt. The housing needs were deemed to be sufficiently pressing to constitute “exceptional circumstances”. In order to address these exceptional circumstances, the RSS Proposed Changes to the general extent of the green belt, removing the designation from the areas required to accommodate the proposed urban extensions.

Policy HMA1: West of England HMA makes provision for 21,300 dwellings during the plan period, 2006 - 2026. Bristol is defined as a Strategically Significant City and Town and is a major driver of the regional economy. The policy is that a better balance between homes and jobs is required to reduce the need to travel. To this end, provision for sustainable urban housing growth is made and a number of urban extensions are proposed. An urban extension to Keynsham was included in the Draft RSS Proposed Changes. The emerging Regional Strategy stated that the general extent of the Green Belt would be maintained subject to alterations to enable the areas of search for urban extensions to be brought forward through the preparation of Core Strategies. Where the general extent of the Green Belt is changed detailed boundaries where to be revised through Local Development Frameworks.

Even though the RSS is due to be abolished, through the Localism Bill and subsequent Act, there are still strong grounds for an urban extension within the Green Belt at Keynsham. Keynsham is a sustainable location. The Panel at the EIP concluded that there was scope for development around Keynsham without compromising or threatening the integrity of the separation of Bristol and Bath by developing in the Green Belt. This would involve a relaxation of the Green Belt boundary in order to achieve the housing numbers but the Examining Panel specifically indicated that in order to meet housing needs of the town as well as the wider HMA, there was an urgent need to relax the Green Belt, the housing pressures within the HMA constitute the exceptional circumstances required by PPG 2 to justify such relaxations.

Changes to the Green Belt are therefore considered necessary in order to accommodate housing needs in accordance with the development plan and in accordance with the latest 2008 household projections, which whilst they give a lower figure than included in the Proposed Changes to the RSS given the development constraints in the remainder of the district, necessitate a need for an urban extension to Keynsham. Land at south west Keynsham is well placed and is not subject to constraints such as flooding, it will not prejudice the visual amenity of Queen Charlton, Chewton Keynsham and the River Chew Valley. Development at south west Keynsham although within the Green Belt would not compromise the main principles of the function of the Green Belt. Unlike other areas around the periphery of Keynsham which are constrained by floodplain, the A4 and the railway line and a nature conservation sites.

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

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not consistent with the development plan. PPS12 paragraph 4.50 states that under the Planning and Compulsory Purchase Act 2004 S 20 (5) (a) an Inspector is charged with firstly checking whether the Core Strategy has complied with legislation. It is considered that for two reasons the Core Strategy is not legally compliant as it is not in general conformity with the development plan (i.e. the RS has now be re-instated as part of the development plan and will remain so until the Localism Bill is enacted – this is envisaged to be late in 2011) and secondly as it fails to take account of national policy in terms of PPS 3 paragraph 33, the Governments latest published household projections ( 2008 based published in Nov 2010) and evidence of current and future housing need as stated in the West of England Housing Market Assessment June 2009. . The Councils own Strategic Housing Market Assessment indicate that there is a very high housing need, both in household growth and in relation to likely total future supply.

The Core Strategy is not legally compliant as it fails in to make adequate provision for housing needs during the plan period.

**Change sought to make legally compliant:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections taking into account evidence of housing need. The housing figures for the plan period should be increased to at least 18,500 dwellings

#### Plan Reference: Paragraph 1.31

**Reference:** 180\11

**Respondent:** J S Bloor Ltd

**Representation (soundness):** The Core Strategy is unsound as the Council states in paragraph 1.26 that provision is made for 11,000 dwellings for the plan period. Whilst the strategy is to locate new development in the most sustainable locations, there is an over reliance on brownfield sites some of which have been included Bath and North East Somerset's Core Strategy – Publication Stage Representation Form in the adopted Local Plan and failed to come forward in the plan period. This point has been made in detail in representations to Policy DW01.

Although there are acknowledged constraints in the district such as the AONB, it was considered through the preparation of the RSS that there was capacity to accommodate in the order of 21,300 dwellings in the plan period. This was consistent with the principles of sustainable development and for BANES included a review of the Green Belt which had been deemed necessary as long ago as in the first RPG10 in 1994. Circumstances have not changed since then and the long term trend is for an increasing population and a strategy based on sustainable growth.

The necessary provision of new homes and also to fulfil the roles of the SSCTs in terms of their economic potential could not be met within the existing urban areas. Through the preparation of the RSS exceptional circumstances have been justified. The RSS identified urban extensions as part of the most sustainable solution for delivering housing and other development. This requires changes to be made to the general extent of the Green Belt. An urban extension to Keynsham was identified. Land at south west Keynsham can accommodate development needs. The location has been promoted in response to the Spatial Options Consultation in 2009.

**Change sought to make sound:** The Core Strategy should be amended to reflect the latest published household projections in accordance with PPS 3 paragraph 33. The general extent of the Green Belt should be altered at south west Keynsham as exceptional circumstances have been proven through the preparation of the RSS.

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not consistent with the development plan. PPS12 paragraph 4.50 states that under the Planning and Compulsory Purchase Act 2004 S 20 (5) (a) an Inspector is charged with firstly checking whether the Core Strategy has complied with legislation. It is considered that for two reasons the Core Strategy is not legally compliant as it is not in general

conformity with the development plan (i.e. the RS has now be re-instated as part of the development plan and will remain so until the Localism Bill is enacted – this is envisaged to be late in 2011) and secondly as it fails to take account of national policy in terms of PPS 3 paragraph 33, the Governments latest published household projections ( 2008 based published in Nov 2010) and evidence of current and future housing need as stated in the West of England Housing Market Assessment June 2009. The Councils own Strategic Housing Market Assessment indicate that there is a very high housing need, both in household growth and in relation to likely total future supply. The Core Strategy is not legally compliant as it fails in to make adequate provision for housing needs during the plan period.

**Change sought to make legally compliant:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections and take account of evidence of housing need. The housing figures for the plan period should be increased to at least 18,500 dwellings

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**Reference:** 264\3 S

**Respondent:** Englishcombe Parish Council

**Representation (soundness):** This Parish Council fully supports the principle of retaining the Green Belt within its current boundaries.

**Change sought to make sound:**

**Representation (legal compliance):** This Parish Council fully supports the principle of retaining the Green Belt within its current boundaries.

**Change sought to make legally compliant:**

**Plan Reference:** Paragraph 1.33

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**Reference:** 180\12

**Respondent:** J S Bloor Ltd

**Representation (soundness):** The Core Strategy in paragraph 1.33 refers to the scale of new homes leading to a significant uplift on past building rates of delivery from around 380 to around 550 dwellings per annum. The actual Bath and North East Somerset's Core Strategy – Publication Stage Representation Form delivery even on the Council's own housing projection figures needs to be higher because it needs to take into account the under build during the years of the Local Plan. The adopted Local Plan envisaged 6,855 dwellings being built in the period 1996 – 2011 i.e. 457 per annum. However, the actual build rate was only 385 dwellings per annum. The delivery of housing is significantly below the rate needed to achieve the requirement in the Local Plan. The Council's AMR 2009/2010 includes the Local Plan Housing Trajectory 1996 – 2011 and shows that the build rate since 1996 has only been above that intended for 4 years of the Local Plan period. In many years it has been significantly below the annual figure intended in the Local Plan (Local Plan Housing Trajectory 1996 – 2011 Part 2).

In order to meet the Local Plan target a further 1,462 dwellings are needed during the final year of the plan, but according to the AMR only 500 units are considered to be deliverable, consequently the delivery will fall short by about 962 dwellings meaning that only 86% of the Local Plan target will have been achieved. The Local Plan strategy was reliant on brownfield sites (up to 68%) and one of the largest sites in the Local Plan was the Western Riverside (450 – 600 units in the Local Plan). The AMR gives the reason for the shortfall in housing completions, as the collapse in the residential housing market and delays in securing external funding at Bath Western Riverside. PPS 3 states that a flexible responsive supply of land needs to be maintained and that the Local Planning Authority should identify sufficient specific deliverable sites to deliver housing in the first five years. To be considered deliverable sites need to be available now, be suitable and achievable.

Local Planning Authorities should also identify a further specific developable sites for years 6 – 10 and where possible for years 11- 15. The Core Strategy is starting from a point of under provision against the adopted Local Plan and therefore this shortfall needs to be made up in the Core Strategy plan period, early in the plan period given the level of housing need. The SHLAA envisages that 3,977

dwellings are deliverable in years 2010/11 – 2014/15 this would equate to approximately 795 dwellings per year ( however this would be nearly twice the build rate of the last year 2009/2010 of 420 dwellings which is below the build rate envisaged in the adopted Local Plan i.e. 457 dwellings per annum). It is consider that this is unrealistic given the current economic climate, and particularly given that much of the Central area and Western Riverside is reliant on £27.6m of public investment for key infrastructure schemes, including flood alleviation, land assembly and remediation.

**Change sought to make sound:** The Core Strategy should be amended to reflect the latest published household projections in accordance with PPS 3 paragraph 33 and to ensure that there is a 5 year responsive supply of housing in accordance with PPS 3 paragraphs 52- 57.

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not consistent with the development plan. PPS12 paragraph 4.50 states that under the Planning and Compulsory Purchase Act 2004 S 20 (5) (a) an Inspector is charged with firstly checking whether the Core Strategy has complied with legislation. It is considered that for two reasons the Core Strategy is not legally compliant as it is not in general conformity with the development plan (i.e. the RS has now be re-instated as part of the development plan and will remain so until the Localism Bill is enacted – this is envisaged to be late in 2011) and secondly as it fails to take account of national policy in terms of PPS 3 paragraph 33, the Governments latest published household projections ( 2008 based published in Nov 2010) and evidence of current and future housing need as stated in the West of England Housing Market Assessment June 2009. The Councils own Strategic Housing Market Assessment indicate that there is a very high housing need, both in household growth and in relation to likely total future supply. The Core Strategy is not legally compliant as it fails in to make adequate provision for housing needs during the plan period. It does not conform to latest Government guidance in terms of the development plan and does not take into account the latest evidence base for the SW RSS.

**Change sought to make legally compliant:** The Regional Spatial Strategy remains part of the development plan, despite the Coalition Government announcing that the RSS was to be abolished. The 6th July 2010 revocation of Regional Strategies was announced with immediate effect. The 6th July revocation decision was then subject to challenge in the Cala Homes (South) Ltd case. The effect of the Cala Homes decision was that the Regional Strategy as it stood on 5th July forms an ongoing part of the development plan. PINs Advice confirms that the RS is part of the development plan until legislation to formally repeal or revoke the RS is implemented. The Core Strategy should be consistent with the development plan and the latest national advice, which now includes the DCLG 2008 based household projections. In the South West the Regional Strategy remains part of the development plan and in this case that is RPG10 September 2001 which became the Interim RSS in 2004.

The Core Strategy does not conform to the Regional Spatial Strategy and no local justification is provided for the lack of conformity.

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

## Plan Reference: Policy DW1: District Wide Spatial Strategy

**Reference:** 24\1 S

**Respondent:** Norton Malreward Parish Council

**Representation (soundness):** The received Draft Core Strategy has been circulated and highlights discussed at the Parish Council meeting held on Tuesday 11th November 2011.

The Parish Council fully supports the contents of the Strategy and are delighted to note that the green belt in the Parish will be protected against the building of new properties. Likewise the scrapping of the proposed South East Urban extension to the City of Bristol was warmly received by the Councillors. We wish for our comments to be taken into account by the respective Inspector.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 73\5 S

**Respondent:** Newton St Loe Conservation Group



**Representation** Specifically we find sound and support the following vision and policies in the new Core Strategy:  
**(soundness):** 3 .Prioritising the use of brownfield opportunities for new development in order to limit the need for development on greenfield sites and  
4. retaining the general extent of Bristol – Bath Green Belt within B&NES with no strategic change to the boundaries also  
6. protecting the district’s biodiversity resource including sites, habitats and species of European importance

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The strategy is to locate new development in the most sustainable locations and therefore the priority is to steer growth to brownfield land in urban areas of Bath, Keynsham and the larger settlements in the Somer Valley.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 84\1

**Respondent:** Mr Roger Chapman

**Representation** I have read the Chronicle of 20 Jan. I believe a shortage of housing, leading to inflated prices, is at the heart of both economic and social problems in Bath and England as a whole. I am also a country lover, enjoying walking in this lovely part of the country. I think it is wrong for the council to rule out of its core strategy, the possibility of building homes on land offered by the Duchy of Cornwall between Bath and Newton St Loe. The Duchy considers this land suitable and I think the council is wrong to rule this out when the need for housing remains so great. I support the inclusion of this land in the plan and oppose the local residents’ vocal campaign against this, which smacks of nimbyism by people who already have a home.

**Change sought to make sound:** Accept the Duchy of Cornwall’s offer to include land between Bath and Newton St Loe as suitable for housing in the core strategy.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 85\1

**Respondent:** Mr Anthony Acton

**Representation** I wholeheartedly agree with the general thrust of the draft strategy, to avoid large scale development in the green belt, to concentrate on developing brownfield sites in Bath, and to look for opportunities to provide affordable housing. I am very pleased to see that the importance of the green setting of the World Heritage Site is recognised. The previous plan's worst feature, in my opinion, was the proposed destruction of the north side of the Avon Valley in its approach to Bath.

I note that the Dutchy of Cornwall plan to challenge the new Draft Core Strategy. During the previous consultation exercise, you provided me with copies of minutes and correspondence between the Duchy and the council, under the freedom of information Act. I was concerned to note from those documents that the duchy were pushing their proposals very hard, and to some extent appeared to be driving the process. Inevitably during the period of several years where that policy was evolving, close relationships built up between the Duchy and some councillors and officials, I am very pleased to note that the council's new strategy makes clear that these relationships have not impeded a radical change of direction.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 91\1 S

**Respondent:** Mr Simon Haywood

**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:**

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**Reference:** 92\1 S

**Respondent:** Jo Haywood

**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 tha 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:**

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**Reference:** 93\14

**Respondent:** Highways Agency

**Representation** Whilst we do not consider this makes the Strategy unsound, the Agency is concerned that there is no

**(soundness):** reference to the Strategic Road Network within the Infrastructure Delivery Programme (although the Agency acknowledges that this is an evolving document). The IOP document is cross referenced several times within the Core Strategy, where it is identified to be the mechanism for securing infrastructure in line with development.

The Agency's concerns specifically related to a lack of reference within the IOP about potential improvements required to the SRN as a result of development, and, that the explanatory text within the Core Strategy potentially limits infrastructure contributions to those identified within the IOP. This raises concerns for the Agency, as our position to require developers to fully fund mitigation works to the SRN, resulting from the impact of proposed development is potentially weakened.

Whilst the Agency is not suggesting that there are infrastructure improvement schemes required on the SRN at this stage, the lack of reference to the SRN may result in this tier of infrastructure being overlooked by developers during the preparation stage of schemes. This lack of clarity is of significant

concern to the Agency, as the wording could potentially restrict the Agency's ability to secure funding for SRN infrastructure improvements required to mitigate development.

In addition, the Council identifies that the evidence base for infrastructure requirements is a key aspect of the Core Strategy (and that the IPO provides the mechanism to secure funding). On this basis, major applications must include a robust evidence base supported by an up-to-date Transport Assessment that is produced in line with the guidance set out within the Oft's Guidance on Transport Assessment document (2007). If mitigation works are required as a result of the development, then the developer will be required to fund works. The Council should also identify their interpretation of major development within the Core Strategy.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 117\1

**Respondent:** Priston Parish Council

**Representation** District Wide Strategy:  
**(soundness):**

1.11 We greatly welcome the initiative of Combe Hay, Englishcombe and Newton St Loe to undertake discussions with Natural England regarding extending the boundaries of the Cotswold ANOB to ensure that it surrounds the city of Bath and hope that this is achieved.

1.23 Underpinning much of the strategy is the section on Development Need where it is stated that the main drivers for development need are changes in demography in terms of population change: i.e. increased life expectancy, and inward migration, as well as lifestyle changes, but it includes no figures for the period up to 2026. Are the figures available for the basis of which development need has been assessed? If not, how has the whole strategy been developed? Further, as these figures have to be predictions, what measures, such as updating of information and review of consequences, are to be incorporated into the Core Strategy so that it remains realistic?

1.33 As B&NES currently has an actual housing shortfall regarding past targets, whilst it is stated that delivery has to significantly increase to achieve current expectations can this realistically be achieved?

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 118\4 S

**Respondent:** Mrs J. Tinworth

**Representation** Housing numbers needed - these must be reduced to sensible and affordable levels  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 126\1 S

**Respondent:** D.M. Phillips

**Representation** In particular I support and find sound:

**(soundness):** a) the protection of the green belt surrounding Bath  
b) the prioritisation of Brownfield sites for new housing development

- c) the development of the MOD sites
- d) the commitment to the environment and to protect local wildlife and habitats
- e)reducing the housing numbers to represent a realistic need and affordable level of development and growth in the region
- f)the eradication of 'planning by numbers'
- g)the development of Western Riverside

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 127\1 S

**Respondent:** Lady Rosemary Thompson

**Representation** In particular I support and find sound:

- (soundness):**
- a) the protection of the green belt surrounding Bath
  - b)the prioritisation of Brownfield sites for new housing development
  - c) the development of the MOD sites
  - d) the commitment to the environment and to protect local wildlife and habitats
  - e)reducing the housing numbers to represent a realistic need and affordable level of development and growth in the region
  - f)the eradication of 'planning by numbers'
  - g)the development of Western Riverside

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 128\1 S

**Respondent:** Ms Margaret Dunn

**Representation** In particular I support and find sound:

- (soundness):**
- a) the protection of the green belt surrounding Bath
  - b)the prioritisation of Brownfield sites for new housing development
  - c) the development of the MOD sites
  - d) the commitment to the environment and to protect local wildlife and habitats
  - e)reducing the housing numbers to represent a realistic need and affordable level of development and growth in the region
  - f)the eradication of 'planning by numbers'
  - g)the development of Western Riverside

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 134\1 S

**Respondent:** Mr and Mrs May

**Representation** In particular I support and find sound:

- (soundness):**
- a) the protection of the green belt surrounding Bath
  - b)the prioritisation of Brownfield sites for new housing development
  - c) the development of the MOD sites
  - d) the commitment to the environment and to protect local wildlife and habitats
  - e)reducing the housing numbers to represent a realistic need and affordable level of development and

growth in the region  
f)the eradication of 'planning by numbers'  
g)the development of Western Riverside

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 135\1 S

**Respondent:** John and Sheila Deuch

**Representation** In particular I support and find sound:

**(soundness):** a) the protection of the green belt surrounding Bath  
b)the prioritisation of Brownfield sites for new housing development  
c) the development of the MOD sites  
d) the commitment to the environment and to protect local wildlife and habitats  
e)reducing the housing numbers to represent a realistic need and affordable level of development and growth in the region  
f)the eradication of 'planning by numbers'  
g)the development of Western Riverside

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 136\1 S

**Respondent:** Mrs B. Hobbs

**Representation** In particular I support and find sound:

**(soundness):** a) the protection of the green belt surrounding Bath  
b)the prioritisation of Brownfield sites for new housing development  
c) the development of the MOD sites  
d) the commitment to the environment and to protect local wildlife and habitats  
e)reducing the housing numbers to represent a realistic need and affordable level of development and growth in the region  
f)the eradication of 'planning by numbers'  
g)the development of Western Riverside

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 138\1

**Respondent:** Mr Christopher Isaac

**Representation** While the proposed Core Strategy generally appears to move in the right direction, one has to be

**(soundness):** concerned (as indicated in the BA 2008 meeting) as to its implementation. Effectively BathNES will have to act in a very corporate way, particularly with respect to providing appropriate employment fabric, the provision of affordable housing and with respect to a proposed cultural / performance arts centre. It will also need to make sure that the Universities invest in a higher percentage of student housing than previously, the lack of which has been to critically reduce the availability (and pricing) of family housing in areas such a Oldfield Park.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 138\4

**Respondent:** Mr Christopher Isaac

**Representation** The Core Strategy rightly recognises the need to address the physical and social problems / needs  
**(soundness):** related to the small towns and villages to the south of Bath. There should be detail local plans produced involving the local communities, which get down to the level of place making, specification of local services, etc. More generally, there needs to be an education / employment strategy which, having studied the essential under-employment / unemployment problems related to lower income households, sets out packages of proposals to encourage employment growth and improve local access into the job market.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 143\2

**Respondent:** Bathampton Parish Council

**Representation** Policy DW1's overarching statement is unexceptionable. However, on account of a successful legal  
**(soundness):** challenge to the Secretary of State's use of his powers the figures previously under consideration have been withdrawn. There is a serious national problem in the discrepancy between new homes required and the number of sites which either have planning permission or are allocated in development plans. How this situation may be resolved is unknown. The Secretary of State's notion that the national need can be met by the aggregation of 'bottom up' proposals coming from local communities seems unlikely to happen. Consequently, the possibility that B&NES may not be required to provide for a portion of that demand is uncertain. In the event of the problem remaining unsolved by the time of the CS's public examination it would be preferable for the text to recognise the potential problem on a 'what if?' basis.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 147\9

**Respondent:** Bath Green Party

**Representation** Climate change  
**(soundness):** In 2007 a supplement to PPS1 was issued. While the RSS has not been updated to take account of the increased emphasis on preventing further climate change, this Core Strategy must adhere to the PPS1 climate change supplement. This will require a fundamental change to planning – a change which is not currently envisaged by the Core Strategy. The supplement to PPS1 says :  
"The Government believes that climate change is the greatest long-term challenge facing the world today. Addressing climate change is therefore the Government's principal concern for sustainable development. ... ..  
KEY PLANNING OBJECTIVES . To deliver sustainable development, and in doing so a full and appropriate response on climate change ... .. secure the highest viable resource and energy efficiency and reduction in emissions; ... .. climate change considerations should be integrated into all spatial planning concerns; ... .. planning authorities should provide a framework that promotes and encourages renewable and low carbon energy generation. Policies should be designed to promote and not restrict renewable and low-carbon energy and supporting infrastructure."

Since 2007 there has been more and more evidence of the urgent need to reduce emissions of GHGs

and the consequences of climate change on people now and in the future. All the evidence strengthens the need to take action that is practicable to prevent further climate change.

We live in extraordinary times. We must take urgent action to prevent further climate change. We must adapt to the inevitable changes in climate, both locally (eg flooding) and also around the world (eg food shortages). We must plan for sustainable lifestyles after Peak Oil. "Business as usual" will not provide solutions to these problems. Fundamental change is needed. B&NES must be enthusiastic in planning solutions to these issues, to be at the forefront, in order to ensure the safety, security and sustainability of its residents. The Core Strategy must be part of these plans for a genuinely sustainable future.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 148\1 S

**Respondent:** Bath Chamber of Commerce

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

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

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

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 148\2 S

**Respondent:** Bath Chamber of Commerce

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

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

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

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 149\1 S

**Respondent:** Jean

**Representation** In particular I support and find sound:

- (soundness):** a) the protection of the green belt surrounding Bath  
b) the prioritisation of Brownfield sites for new housing development  
c) the development of the MOD sites  
d) the commitment to the environment and to protect local wildlife and habitats  
e) reducing the housing numbers to represent a realistic need and affordable level of development and growth in the region  
f) the eradication of 'planning by numbers'  
g) the development of Western Riverside

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 150\1 S

**Respondent:** Mr and Mrs Awebb

**Representation** In particular I support and find sound:

- (soundness):** a) the protection of the green belt surrounding Bath  
b) the prioritisation of Brownfield sites for new housing development  
c) the development of the MOD sites  
d) the commitment to the environment and to protect local wildlife and habitats  
e) reducing the housing numbers to represent a realistic need and affordable level of development and growth in the region  
f) the eradication of 'planning by numbers'  
g) the development of Western Riverside

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 152\3 S

**Respondent:** Corston Parish Council

**Representation** Objective 3. We feel the council should concentrate on the development of brown field sites such as

- (soundness):** Cadbury at Keynsham, Riverside in Bath, and as they become available, ex.Ministry of Defence sites throughout the area. Additionally, we consider that in the past planning decisions for major development projects have taken too long to reach a conclusion and in future the process needs to be significantly shortened.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 161\2 S

**Respondent:** Greenway Residents forum

**Representation** We believe that an excellent job has been done on the Strategy itself, and particularly welcome the

- (soundness):** focus on green infrastructure which is properly threaded throughout the document, the attention paid to public transport, and the exclusion of the threatened urban extension which would have damaged Bath and the Cotswold AONB.

**Change sought to make sound:**



**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 162\4

**Respondent:** Batheaston Parish Council

**Representation** We find Policy DW1's overarching statement unexceptionable. However, on account of a successful (soundness): legal challenge to the Secretary of State's use of powers the figures previously under consideration stand withdrawn. However, there is a serious national problem in the discrepancy between new homes required and the number of sites which either have planning permission or are allocated in development plans. Where this cloud of demand may come to rest is an unresolved question. The SofS's notion that the national need can be met by the aggregation of 'bottom up' proposals coming from local communities seems hardly likely to happen. Consequently, the possibility that B&NES may not be required to provide for a portion of that demand cannot but be uncertain. In the event of the problem remaining unsolved by the time of the CS's public examination it would be preferable for the text to recognise the potential problem on a 'what if?' basis by stating in what way it would deal with any additional demand. While it is probably likely that this would be on a sequential basis relying on information already gathered on housing land availability such an outlook should form part of the CS text. That kind of issue is dealt with in only a limited way in paragraph 1.36. While the anatomy of the District's built and natural environment is expressed as separate items of infrastructure at DW1 1-13 in Table 2 and its physiology as strategic objectives 1-7, the text gives little recognition to the fact that in many instances these aspects will be found in conflict. That the quality of both cityscape and landscape requires particularly high planning standards against this background requires emphasis in the accompanying text.

**Change sought to** i) Insert in Policy DW1 after paragraph 2 'In the event of a regional demand for additional housing **make sound:** be imposed on the LPA a sequential examination of the site information which underlies the CS will be undertaken and any subsequent change in paragraph 2 figures will give rise to the amendment of Diagram 4.

(ii) Add to paragraph 1.35 'The potential conflict between strategic objectives will require resolution through very high and exacting standards of planning practice.'

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 170\1

**Respondent:** Robert Hitchins Limited

**Representation** The Core Strategy is not effective in that it does not respond to and meet CS Objective 5 namely (soundness): meeting housing needs. The housing numbers proposed (550 dpa) are not founded upon a robust and credible evidence base as evidenced by the inconsistency with Regional Spatial Strategy, the latest household projections (including projections commissioned by Barton Willmore) and the Strategic Housing Market Assessment. Furthermore it is not consistent with national policy (both existing and emerging) in that it does not meet the objectives set out therein. I address each of these points below.

The Draft Regional Spatial Strategy for the South West proposed that 775 dpa be constructed within the District. The Proposed Modifications to the RSS proposed that 1,065 dwellings should be constructed annually within the District. The 2008 based projections for England and the Regions indicates that the number of households within B&NES will increase by some 16,000 in the period 2006 to 2026 (800 new households per annum) and the evidence of the Strategic Housing Market Assessment is that there is a need for 847 affordable dwellings annually.

Chelmer Projections undertaken by Cambridge Econometrics for Barton Willmore in Bath and North East Somerset's Core Strategy – Publication Stage Representation Form Bath and North East Somerset's Core Strategy – Publication Stage Representation Form January 2011 show that the demographic change (based on a continuation of long-term average migration levels) will result in a further 15,100 households (755 new households per annum) in the period 2006 to 2026. The labour force increasing

by 10,558 over the same period. See Appendix 1 Table 1 attached.

Dwelling-led projections have also been prepared to show the effect of the Core Strategy proposal to provide for just 11,000 dwellings (550 dpa) over the Plan period on the District's population and labour supply. In summary in the period 2021 - 2026 there will be migration out of the district (-1,563) and the labour supply will have grown by just 2,900 (2,891) between 2006 and 2026. See Appendix 1 Table 2 attached. In short by the end of the Plan period there will be a declining population and insufficient labour to meet the economic aspirations of the Plan.

Furthermore it is submitted that the Core Strategy has no regard to the need to accommodate growth arising in the neighbouring area; namely Bristol which cannot be met within the City's administrative area. I attach as Appendix 2 a copy of our representations in respect of its Core Strategy.

When taken together the evidence indicates that the Core Strategy should be planning to provide considerably more dwellings per annum than are currently proposed and that a proportion of these dwellings should be provided in locations around Bristol to meet its needs. In terms of assessing an appropriate level of growth it is our submission that an additional 16,000 homes will be needed within the District to meet indigenous needs (having regard to demographic changes, vacant and second homes) and at least a further 4,000 homes to meet part of Bristol's unmet need (which we assess to be 20,000 homes plus). B&NES should therefore be planning for a total of at least 20,000 homes to be constructed in the period 2006 to 2026 (1,000 new homes per annum).

Revised PPS3, (June 2010) seeks a "Step Change" in housing delivery, through a new, more responsive approach to land supply at the local level. Paragraph 32 of PPS3 states that: "The level of housing provision should be determined taking a strategic, evidence-based approach that takes into account relevant local, sub-regional, regional and national policies and strategies achieved through widespread collaboration with stakeholders."

Paragraph 33 of PPS3 advocates that in determining the local level of housing provision, LPAs should take into account the evidence of current and future levels of need and demand for housing and affordability levels based on a number of factors including; evidence within the SHMA, NHPAU, advice on affordability levels and Government household formation forecasts.

Guidance published on 6th July 2010 by the Chief Planner, Steve Quartermain at CLG states that: "Local authorities should continue to collect and use reliable information to justify their housing supply policies."

It is not considered that the B&NES Future Housing Growth Requirements to 2026 Stage 2 Report either meets the approach advocated in guidance or provides sufficient justification for deviating from what the evidence overwhelmingly indicates is required. Attention is also drawn to Economic Prediction and the Planning Process<sup>1</sup> which provides background to the use of SW Growth Scenarios (Oxford Economics June 2010) in assessing future housing requirements.

A failure to meet housing need renders the Core Strategy inconsistent with national policy as expressed in PPS3; namely the achievement of The Government's key housing policy goal which is "to ensure that everyone has the opportunity of living in a decent home,

Bath and North East Somerset's Core Strategy – Publication Stage Representation Form which they can afford, in a community where they want to live".

**Change sought to** Amend sub paragraph 2 of Policy DW1 (District-Wide Strategy) to require that provision be made for a  
**make sound:** net increase of at least 20,000 homes between 2006 and 2026.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 170\2

**Respondent:** Robert Hitchins Limited

**Representation** URBAN EXTENSION

**(soundness):**

There are exceptional circumstances that require the review of the Bristol – Bath Green Belt; namely the need to accommodate development required in the period to 2026 in the most sustainable locations. See our representation above to Policy DW1 sub paragraph 2 which makes clear our view that the Core Strategy is unsound in that regard. In order to accommodate the scale of development required in the most appropriate locations it is necessary to examine whether there is a need to remove land from the Green Belt. This exercise was undertaken in the context of the preparation of the Regional Spatial Strategy and the further work resulting in the Bath and North East Somerset Core Strategy Spatial Options Consultation October 2009 and the area to the south east of Bristol at Whitchurch was identified by the Council for removal from the Green Belt in order to accommodate the scale of development required then.

The adopted Local Plan identifies 6 purposes of including land within the Bristol - Bath Green Belt. This is reproduced at Table 8 of the Draft Core Strategy. Land at Whitchurch is considered in the table below against each of these purposes:

(see email)

As noted in the October 2009 Spatial Options Consultation this area has:

“..the potential to be well integrated into the existing urban area of South East Bristol with access to a wide range of services and facilities supporting the needs of the new and existing communities. Development in this area would offer an opportunity to develop around Whitchurch village. The disused railway track bed is an opportunity to provide a green link from the Bristol urban area out to the new neighbourhood. There are opportunities to extend existing and planned public transport services from Bristol into the Whitchurch area.”

and thus would clearly be a sustainable location for future development.

The Concept Plan below shows an area that could be released from the Green Belt at Whitchurch to accommodate around 295 new homes whilst; retaining the distinctiveness of Whitchurch as a separate settlement (not disrupting green links and the visual separation of Whitchurch from other settlements) by means of significant areas of green infrastructure which link into existing green infrastructure extending into Bristol. Development in this location could take place without impact on the setting of the scheduled ancient monument Maes Knoll, or the Chew Valley skyline.

**Change sought to** Amend Criterion 4 of Policy DW1 to provide for the release of land at Whitchurch from the Green Belt  
**make sound:** and consequential amendments to the Key Diagram.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 180\19

**Respondent:** J S Bloor Ltd

**Representation** The Core Strategy is based on 11,000 dwellings for the plan period 2006 – 2026 which is a significant  
**(soundness):** reduction on the housing figure in the Proposed Changes to the RSS and in the latest 2008 based household projections. It is even a reduction on the First Detailed Proposals that BANES submitted to the preparation of the Regional Spatial Strategy in December 2005. The figure of 15,500 dwellings was included in the RSS which was in effect the First Detailed Proposals.  
The housing figures in the RSS were based on the 2003 based household projections and by the time the Examination in Public had taken place and the Secretary of State Proposed Changes were published the 2004 based projections had been updated and amended. By increasing the housing figures the Secretary of State took into account a number of factors which still remain relevant to the consideration of housing provision for BANES. These factors are the strategic context, economic growth, demographic evidence, long term affordability, strategic potential, deliverability and the Sustainability Appraisal.

The Proposed Changes to the RSS increased the figure for BANES to 21,300 dwellings based on the 2004 household projections. BANES in producing the Core Strategy Spatial Options consultation in October 2009 reduced the housing figure to the Draft RSS figure of 15,500 dwellings on the basis that major changes had taken place in the country's economic position. However, the 2009 consultation

document stated in respect of the 15,500 dwellings “If this level of housing is not provided then it will have serious implications, preventing some people having access to a decent home, making housing less affordable (to buy or rent) and in the longer term damaging the local economy by reducing labour supply and mobility.”

It must be questioned what has changed in the last 12 months for BANES to reduce the housing figure by 26%. The South West Gross Value Added (December 2010) produced by the South West RDA shows that the GVA figures for the South West show that the South West region showed a relative degree of resilience to the recession during 2009. The report states that; “Sub regionally the pattern showed relative strength in the counties of Cornwall, Bristol and Bournemouth and Poole all showing growth in 2008.”

The latest 2008 based household projections for England and the Regions indicate that for BANES the increase from 2006 – 2026 will be 16,000 households i.e. 800 households per annum. In terms of dwellings this amounts to approximately 16,720 dwellings i.e. 850 dwellings per annum. Evidence of the total households in need as set in SHMA in Figure 20 of the Executive Summary (June 2009) Table 4.11 in the Main Report indicates that there are 847 per annum in households in need i.e. those who need social rented and intermediate housing. For the period 2009 – 2021, provision needs to be made for 10,164 dwellings to meet those in housing need; however this only corresponds to 12 years of the plan period. If this figure were replicated for the remaining years of the plan period i.e. 17yrs from the 2009 base years this would equate to the need for 14,399 dwellings that would need to be provided to meet those in housing need. A 20 year plan period based on 847 per annum would equate to a need to provide for 16,940 dwellings (this figure is similar to the latest 2008 based household projections of 16,000, or 16,750 dwellings), but only meets those in need of affordable housing as opposed to also meeting needs for market housing.

The Core Strategy is unsound as it is not justified, effective and consistent with national policy. It is not founded on a robust and credible evidence base as it is based on projections of lower levels of growth of recent years rather than taking a long term approach for the plan period. The SWRDA Report “Economic Prediction and the Planning Process” January 2011 states that: “There is a danger that the South West’s historical under provision is exacerbated if planning figures are linked solely to a particular low “average” growth rate scenario. In turn, this tends to create higher carbon outcomes in terms of commuting and extended travel to work areas and negative social externalities related to housing affordability”. Representations on Strategic Objective 5 make reference to the SWRDA report in more detail; the housing target should not be focussed on the short term i.e. what happened in the last 2 years.

[Http://economy.swo.org.uk/publications/special-economy-module-publications/](http://economy.swo.org.uk/publications/special-economy-module-publications/)

The Core Strategy is not consistent with national guidance in PPS3 paragraph 9 which states that: “The Government’s key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.” Constraining the housing supply to 11,000 dwellings for the plan period will fail to meet the Government’s key housing objective. Constraining the supply of housing is not consistent with the overall national objective of increasing the availability of housing. This has been reiterated in recent ministerial statements and in particular the White Paper “Local Growth: realising every place’s potential” October 2010. Box 2A states:

“Local authorities have a critical role to play in supporting the economy in their area and have wide range of levers at their disposal.... Supporting growth and development through ensuring a responsive supply of land that supports business growth and increases housing supply;”

PPS 3 (June 2010) paragraph 32 states that: “The level of housing provision should be determined taking a strategic, evidence based approach that takes into account relevant local, sub-regional, regional and national policies and strategies achieved through widespread collaboration with stakeholders.”

PPS 3 paragraph 33 is also relevant to this point, it states that “In determining the local,.... Level of

housing provision, Local Planning Authorities ....working together should take into account:  
-Evidence of current and future levels of housing need and demand for housing and affordability levels based upon:  
- Local and sub regional evidence of need and demand, set out in Strategic Housing Market Assessments and other relevant market information such as long term house prices.  
- Advice from the National Housing Planning Advice Unit (NHPAU) on the impact of the proposals for affordability in the region.  
- The Government’s latest household projections and the needs of the regional economy, having regard to economic growth forecasts.” Local and sub- regional evidence of the availability and suitability of land for housing using the SHLAA..... The Governments overall ambitions for affordability across the housing market, including the need to improve affordability and increase in housing supply.....”

#### Policy DW01 Criterion 3

Policy DW01 prioritises the use of brownfield sites, whilst this is consistent with PPS 3 it should not be at the exclusion of non brownfield sites. There is an over reliance on brownfield sites to meet the housing need. Evidence from the Local Plan period shows that a reliance on brownfield sites led to a shortfall in housing provision. Only in four years of the Local Plan period did completions reach and exceed the Local Plan target. There is a need to provide a sufficient quantity of housing taking into account need and demand and seeking to improve choice, which is set out in PPS 3 planning for housing policy objectives. The figure of 11,000 dwellings is based on the capacity of the SHLAA which is based on density assumptions of 50 dph which are much higher compared to what is likely to be achieved. If lower densities were to be achieved then there would be a need for more locations to be included in the Core Strategy even based on the Council’s assumptions of 11,000 dwellings.

#### Policy DW01 Criterion 4

Policy DW01 retains the Bristol Bath Green Belt within BANES with no strategic change to the boundaries of the Green Belt within the Plan period. The need to review the Green Belt was recognised in the 1994 Regional Planning Guidance 10, paragraph 4.11 and subsequently in RPG10 in 2001 which became the Interim RSS in 2004. Policy SS4 Green Belt stated that as a key element of the future planning of the region , local planning authorities when preparing their development plans:  
- “ critically review the Green Belt to examine whether the boundary alterations are needed to allow for long term sustainable development needs;  
- Remove land from the Green Belt for development, if on balance, this would provide the most sustainable solution for accommodating future development requirements.”

A review of the Green Belt for Bath and Bristol was required. This was to be taken forward in the review of the Joint Avon Structure Plan; however this was overtaken by the review of the RSS. More recently the review of the Green Belt was specified in the RSS and the Proposed Changes. There are exceptional circumstances that require the review of the Bristol – Bath Green Belt; namely the need to accommodate development required in the period to 2026 in the most sustainable locations. In order to make the necessary provision for new homes and to fulfil the Strategically Significant Cities and Towns economic potential which cannot be met in the existing urban areas; the most sustainable solution is to provide for urban extensions. There are exceptional circumstances that require the review of the Bristol – Bath Green Belt; namely the need to accommodate development required in the period to 2026 in the most sustainable locations. It is necessary for BANES to examine and review the detailed boundaries of the Green Belt given that the RSS makes changes to the general extent. To address these exceptional circumstances, the RSS makes changes to the general extent of the Green Belt, removing the designation from areas required to accommodate the proposed urban extensions. The supporting text to proposed Policy HMA1 sets out the exceptional circumstances which justify the changes to the general extent of the Green Belt and 3,000 dwellings in an urban extension to Keynsham was identified by the Panel following the Examination in Public into the RSS. Irrespective of the fact that the RSS has not been finally approved the evidence base is up-to-date and endorse the need to alter the boundaries of the Green Belt. (This need was also originally raised in the RPG 10

Interim RSS for the South West). This need is further supported by the latest 2008 based household projections. Consequently, there is a need to remove land from the Green Belt given the level of housing that needs to be provided to meet the forecast requirements. The Core Strategy is therefore unsound; by failing to review the Green Belt the Council is failing to meet housing needs in BANES for the plan period.

The housing provision in Policy DW01 of 11,000 dwellings for the plan period fails to meet the housing needs of BANES, "Housing Growth Requirements to 2026: Stage 2 Report" provides insufficient justification for the lower housing figure included in the Core Strategy. The approach is inconsistent with national guidance and is based on a low economic growth scenario of recent years rather than taking a view of the long term. It is inappropriate to base the long term spatial vision on the current economic climate. Over the life of the Core Strategy, it is inevitable that the economic climate will change, consequently the Core Strategy should be prepared so as to enable appropriate levels of housing provision to occur over the lifetime of the Plan and for it to be monitored accordingly. Failure to provide sufficient housing will have serious implications as the Council has indicated previously in the Consultation on the Spatial Options against the higher figure of 15,500 dwellings, preventing some people having access to a decent home, making housing less affordable (to buy or rent) and in the longer term damaging the local economy by reducing labour supply and mobility.

**Change sought to make sound:** The housing figures for the plan period should be increased to at least 18,500 dwellings. Amend sub paragraph 2 of Policy DW01 to read, "making provision for.....at least 925 dwellings to be constructed annually (18,500 between 2006 and 2026). Amend sub-paragraph 4 of Policy DW1 to provide for the release of land at Keynsham from the Green Belt, and amend the Key Diagram to this effect.

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not consistent with the development plan. PPS12 paragraph 4.50 states that under the Planning and Compulsory Purchase Act 2004 S 20 (5) (a) an Inspector is charged with firstly checking whether the Core Strategy has complied with legislation. It is considered that for two reasons the Core Strategy is not legally compliant as it is not in general conformity with the development plan (i.e. the RS has now be re-instated as part of the development plan and will remain so until the Localism Bill is enacted – this is envisaged to be late in 2011) and secondly as it fails to take account of national policy in terms of PPS 3 paragraph 33, the Governments latest published household projections (2008 based published in Nov 2010) and evidence of current and future housing need as stated in the West of England Housing Market Assessment June 2009. The Core Strategy is not legally compliant as it fails in Policy DW01 to make adequate provision for housing needs during the plan period. It does not conform to latest Government guidance in terms of Regional Strategy which remains part of the development plan and the latest evidence base for the SW RSS or the latest CLG 2008 based household projections. The Councils own Strategic Housing Market Assessment indicate that there is a very high housing need, both in household growth and in relation to likely total future supply.

**Change sought to make legally compliant:** The Regional Spatial Strategy remains part of the development plan, despite the Coalition Government announcing that the RSS was to be abolished. The 6th July 2010 revocation of Regional Strategies was announced with immediate effect. The 6th July revocation decision was then subject to challenge in the Cala Homes (South) Ltd case. The effect of the Cala Homes decision was that the Regional Strategy as it stood on 5th July forms an ongoing part of the development plan. PINs Advice confirms that the RS is part of the development plan until legislation to formally repeal or revoke the RS is implemented. The Core Strategy should be consistent with the development plan and the latest national advice, which now includes the DCLG 2008 based household projections. In the South West the regional strategy remains part of the development plan and in this case that is RPG10 September 2001 which became the Interim RSS in 2004. The Core Strategy does not conform to the Regional Spatial Strategy and no local justification is provided for the lack of conformity. The housing figures for the plan period should be increased to at least 18,500 dwellings.

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**Reference:** 184\2

**Respondent:** Persimmon Special Projects

**Representation (soundness):** Persimmon Special Projects object to Policy DW1, on the basis that there is no evidence base to justify the Settlement Strategy set out in the Core Strategy. A previous document, the Core Strategy Information Paper entitled Settlement Classification October 2009, does not provide evidence for and support the Settlement Strategy set out in the Core Strategy, but instead supports the previous Settlement Strategy based on the emerging RSS. Nevertheless, we consider the information set out in that document and specifically the facilities identified in Appendix 1 supports the inclusion of Bathampton as a Policy RA1 Village.

**Change sought to** (1) Background evidence to support the Settlement Strategy set out in the Core Strategy.  
**make sound:** (2) Include Bathampton as an RA1 Village, as it more appropriately meets the criteria set out in Policy RA1 than some existing RA1 Villages.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 184\4

**Respondent:** Persimmon Special Projects

**Representation** Persimmon Special Projects object to the proposed housing and job provision set out in Policy DW1 for  
**(soundness):** the following reasons: -

1. It does not take account of the RSS evidence base, which remains a material consideration and neither the Core Strategy, nor the Keith Woodhead Projection Report justifies the significant departure from the RSS figures.
2. The Keith Woodhead Report is based on a pessimistic interpretation of current economic circumstances. If the RSS figures are too high because of a now arguably optimistic scenario, the Woodhead scenario is equally unrealistic.
3. The Woodhead Report is put forward "to provide evidence based guidance on an appropriate future housing requirement". However, it includes a number of Policy assumptions which cast doubts on the objectivity of the evidence. For example, Paragraph 3.2 says that RSS levels "are difficult enough to plan for", Paragraph 3.3 says "there is no realistic possibility of building our way out of the problem", and Paragraph 4.1 says the approach is "realistic about the way the housing market operates in the real world". All this suggests that bias has influenced the production of deliberately low figures, rather than producing a genuine evidence base figure to which Policy considerations are then applied.
4. We consider the jobs projection from which the housing figure is derived is too low in the Woodhead Projections. This is simply illustrated in Paragraph 7.3 which says "more encouragingly (our emphasis), the Oxford strong trend/higher growth scenario growth figures for BANES (11300) are virtually identical to the Stage 2/TYM figure of 11200", which "does provide some reassurance of the validity of this figure as a potential planning tool". This suggests a more realistic jobs total to plan for would be 11300. We set out in 9 below further reasons for this.
5. The 2008 CLG Household Projections show an increase of 16000 households in Bath and North East Somerset between 2006 and 2026. Allowing for conversion from households to dwellings, produces a considerably higher figure than the 11000 dwellings contained in the Core Strategy.
6. Part of the conversion factor required in 5 above is an allowance for unmet backlog. In this regard we consider backlog is inadequately dealt with in the Woodhead Projections. A Methodology is set out in Paragraph 5.1.7, but only addresses the backlog relating to affordable housing, by relying on the West of England SHMA (which itself does not address market housing), or housing waiting lists. An alternative would be to assess backlog against the unmet RSS figures.
7. Woodhouse accepts the impact of migration on Bath, including in-migration, and we suggest proper account needs to be taken of the impact of migration. Nationally, the ONS Migration Statistics for 2009, published in November 2010, shows less numbers left the UK than arrived (368000 out, 567000 in). Generally this rejects the argument that figures can be reduced due to lower than expected International migration, which will have an impact in the South West, which has the highest net inflow after the South East and particularly in Bath for the reasons put forward in the Woodhead Report.
8. The Woodhead Projections have drawn on work by Oxford Economics for the South West RDA and South West Councils published in June 2010, which uses a substantially reduced growth rate than that in the RSS. This approach has been questioned by the RDA itself and the South West Observatory in a Report published in January 2011 (Economic Prediction and the Planning Process a Contribution to the Current Debate About Regional Planning for Housing Need After the Recession). This challenges the way the data has been used. It shows that even using the lower growth rate of 2.35% for the South West, this is still 80% of the pre-recession growth and would not justify a cut of over 50% in the housing figures.
9. There are 4 other useful reminders in the South West Observatory Report above, which apply directly to BANES: -
  - a) Current Policy remains to improve sustainable growth and job creation rates in the longer term

(including efforts to encourage people to live closer to where they work).

B) It is easier to adjust plans downwards, in the event of lower growth than expected, than to correct the errors of under planning retrospectively.

C) Reliance on single point estimates will always be wrong.

D) "There are no right answers but there maybe wrong ones such as the engendering of negative externalities implicit in a "race to the bottom".

For all the above reasons, we consider the BANES Core Strategy has arrived at the wrong planning answer to housing and job figures.

**Change sought to make sound:** To increase the housing figures in the Core Strategy based on the alternative evidence sources set out above.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 208\3 S

**Respondent:** Brian C Tanner

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

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

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

3.0 The prioritisation of Brownfield sites for the development of new housing development.

I trust that these comments are helpful in your deliberations.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 216\2

**Respondent:** Richard Morison

**Representation (soundness):** The Draft Core Strategy Publication (December 2010) identifies a requirement for 11,000 new homes in the period to 2026. Of this figure 800, new homes are identified for the Rural Areas.

In line with the letter to all Local Authorities of 21 December 2009 (from the Government Office for the South West) we would endorse the position and advice which remains that the Proposed Changes to the RSS are likely to be 'material considerations' for any future planning decisions. As such, the increased need for new housing in the District should be recognized through higher allocations of housing land, however this may be distributed. This position remains given the recent successful challenge to the High Court by CALA homes; the RSS continues to be a material consideration.

The option of dispersing growth to rural centre's, to further sustain their future is preferable to previous versions of the Core Strategy that proposed an option for growth centered on existing cities. We note however that the figure of 800 new homes is significantly fewer than in previous revisions of the Core Strategy.

**Change sought to make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 222\1

**Respondent:** Duchy of Cornwall

**Representation** The policy is not sufficiently robust to deal with any increase in housing that may be required on  
**(soundness):** account of changes in demography, for example those forecasted by the DCLG Household Projections 2010 or under-delivery in the provision of housing and jobs within Bath and North East Somerset.

The Policy is insufficiently flexible to deal with the potential for change to the housing numbers either through under delivery or the need for an increase in housing. The target figure of 11,000 homes is significantly lower than the target figure agreed between authorities in the West of England Partnership (Bristol, B&NES, North Somerset and South Gloucestershire) of 15,500 homes for the Draft RSS.

(More evidence supplied in email)

**Change sought to make sound:** Policy DW1 must show how the vision, objectives and strategy for the area will be delivered, including making provision for the necessary flexibility to deal with changing circumstances.

As set out in PPS12, the CS should be prepared against the regional framework set out in the evidence base to the draft RSS. This includes having regard to, inter alia, the overall housing requirement to be met during the plan period as well as the broad locations for growth.

The Policy should be amended to provide for a more targeted approach to the distribution and delivery of housing within the Borough. This should include reference to the need for the release of land west of Twerton to provide for a sustainable urban extension for up to around 2,000 dwellings.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\3 S

**Respondent:** Bath Preservation Trust

**Representation** We wish to SUPPORT the downward revision of housing and growth targets from the previous draft  
**(soundness):** Core Strategy, which we felt were unrealistic. We believe that even these figures could be perceived as challenging in the current climate. Policy DW1 should recognise that Bath's special qualities (as identified in para 1.21) will limit its capacity for extensive expansion in perpetuity. We have suggested some drafting changes to DW1 and related paragraphs to achieve this.

**Change sought to make sound:** 'recognising that the district's outstanding environmental quality, as recognised by national and international designations of protection, is of paramount consideration when planning the future of the area';

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\4 S

**Respondent:** Bath Preservation Trust

**Representation** We also SUPPORT the priority in paragraph 1.26 to steer growth to brown field land in urban areas, in  
**(soundness):** Bath Keynsham and the larger settlements in the Somer Valley. This strategy must be adhered to in order to ensure that regeneration of the rundown areas of the city of Bath takes place and the setting of the World Heritage Site is protected.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\5 S

**Respondent:** Bath Preservation Trust

**Representation** We also SUPPORT the Policy on new development in rural areas as described in 1.30.

**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\6 S

**Respondent:** Bath Preservation Trust

**Representation** Overall we believe that the District Wide Spatial Strategy sets out a realistic Policy for achieving the

**(soundness):** necessary housing growth without destroying the distinctiveness of the district.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\7 S

**Respondent:** Bath Preservation Trust

**Representation**

**(soundness):**

**Change sought to** Para 1.25 should explicitly recognise Wiltshire.

**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 224\8 S

**Respondent:** Bath Preservation Trust

**Representation**

**(soundness):**

**Change sought to** Policy DW1(4) should refer to development using sustainably sourced and local materials.

**make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 225\1

**Respondent:** Bath & North East Somerset Allotments Association

**Representation** Section 1d, the District-wide spatial strategy, refers to the Strategic Housing Land Availability

**(soundness):** Assessment as part of the evidence-base for development land supply. This includes a number of sites

which are either historical allotment sites, new allotment sites or potential allotment sites.

**Change sought to** Although the sites have effectively been rejected because of their unsuitability/unavailability, it is

**make sound:** worth making the following comments:

Historic allotments

Wal1 - Southbourne Gardens - Replacement allotments contained within S106.

Wid18 - Lime Grove School - Land was taken from Canal Gardens allotments to construct the school.

Since it has closed, attempts have been made to persuade the Council to release grassland play areas around the school to be used for temporary allotments but the land has stood idle since 2007. As these pieces of land have not been built on, they could be returned to allotments.

Lyn6 - Beechen Cliff School - This playing field was used as allotments during and after WWII. It should be protected from development.

Old4 - Land off Claude Ave - This land was originally all smallholdings but, until the adoption of CF.8, many of them changed as a process of attrition into small-scale commercial enterprises. A few remain and are protected by CF.8.

Current allotment developments

Cdn2 - Rear of Foxhill Community Centre - The Council has recently created allotment plots on this site.

Odn2 - Allotments, Bloomfield Drive - This historic allotment site has now been brought back into use, renamed as Corston View allotments.

Potential allotments

Wes12 - Lansdown View allotments - This privately-owned, former allotment site was designated for allotment use in the previous Local Plan. It continues to be protected from development under CF.8.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 235\1 S

**Respondent:** Mendip Hills AONB Unit

**Representation** This appears to be appropriate in terms of future development needs relating to the part of B&NES  
**(soundness):** within the Mendip Hills AONB.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 236\1 S

**Respondent:** North Somerset Council

**Representation** North Somerset Council supports the approach taken in respect of the spatial strategy, particularly the  
**(soundness):** revised district-wide dwelling requirement. The government has announced a clear intention to revoke regional strategies and the Council's approach towards identifying new locally-derived housing numbers to underpin the Core Strategy approach to 2026 is justified. The draft RSS, while it reached an advanced stage of preparation, was never adopted, and will never be adopted given the dismantling of the regional infrastructure, and proposed an inappropriate and often undeliverable quantum of growth which failed to reflect the aspirations of local communities. North Somerset has been co-operating with Bath and NE Somerset and other West of England authorities to identify the most appropriate strategy post-RSS, and the evidence base underpinning the North Somerset approach supports the methodology and conclusions which will best meet the needs and objectives of not only Bath and NE Somerset, but the wider sub-region. This will be further reflected and articulated through the work of the West of England Partnership and the Local Enterprise Partnership.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 238\1

**Respondent:** Nash Partnership

**Representation** As stated in PPS12, one of the key tests of soundness is the effectiveness of a Core Strategy. Paragraph  
**(soundness):** 4.44 of PPS12 states that to be effective, Core Strategies must be 'deliverable, flexible and able to be monitored'. The emerging Core Strategy fails in this respect, as it is too rigid in its structure, and relies entirely on a review of the plan as a means of handling uncertainty.

An example of this is the inflexible approach taken for Keynsham. The Core Strategy cites the importance of economic growth, with support for it being provided by 1,500 new homes and 1,500 new jobs. However, the proviso is made that no changes will be made to the Greenbelt, and the majority of development will take place on Brownfield sites. Whilst we support the intention of redeveloping Brownfield sites, the Core Strategy also needs to incorporate a high level of flexibility so it can respond to economic fluctuations and unforeseen issues. Recent economic activity and pressures on finance streams have made some Brownfield sites completely unviable, and their delivery has had a significant impact on housing supply trajectories. In some cases, allocated sites with outline planning permission have struggled to come forward, or have a significant level of work required to bring them forward. Some existing allocated sites (such as those to the south of Keynsham) are not as sustainable as others – their ‘bolted on’ location on the periphery of the town reflects the poor approach to development before the sustainability agenda was more fully understood.

Looking at the District as a whole, the assumptions made on delivery of housing sites are also inflexible. The heavy reliance on land at Fox Hill, Warminster Road and Endsleigh coming forward for development and the rather ill considered potential for the variation of uses in Bath’s western corridor to respond to needs for development is inflexible, and does not take into account the difficult nature of privately owned sites and the timescales and uncertainty associated

Bath and North East Somerset’s Core Strategy – Publication Stage Representation Form with them. Again, we reiterate that such an approach is not flexible, and therefore fails the ‘Effective’ element in The Tests of Soundness.

It is our view that the emerging Core Strategy is ineffective because of its inflexibility, particularly in relation to Keynsham. On this basis the emerging Core Strategy is unsound.

**Change sought to make sound:** Whilst the intention to utilise Brownfield sites is admirable and appropriate, the Core Strategy needs to include text that allows for alternative sites to be included if required. These should be examined annually within the Strategic Housing land Availability Assessment, and the Core Strategy should be flexible enough to allow such sites to come forward if previously identified sites are undeliverable. Whilst we have no objection to sites and broader areas being identified in the Core Strategy, there must be methodology that allows for alternative sites to come forward if necessary. More flexibility must be built into the plan, thereby meeting the ‘effective’ element in The Tests of Soundness.

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

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

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**Reference:** 244\1

**Respondent:** Home Builders Federation

**Representation (soundness):** Relationship of the Core Strategy to the South West Regional Spatial Strategy

The outcome of the CALA Homes legal challenge clarified that the Regional Strategies remain for the time being a part of the development plan process. They will, hence, remain a part of the planning decision-making process until the Government’s new planning system is introduced via the Localism Bill which will dispense with the need for RSs to form a component of the planning system.

Although the South West Regional Spatial Strategy (SW RSS) was never finally published under the last Government, it had been subject to a lengthy public examination and consultation on the proposed changes. It did therefore constitute the ‘emerging’ spatial plan for the region, and although it is not part of the development plan it should be accorded significant weight. It provides the most up to date and publicly contested evidence base for the region.

If the Localism Bill is passed by Parliament then regionally-set housing targets will be removed. Responsibility for establishing a housing requirement for the Local Development Framework (LDF) will then fall to local councils. The Secretary of State has confirmed that local housing targets may be tested through the LDF process and local authorities will need to collect and use reliable information to justify housing policies and defend them at examination. The policy provisions of PPS3 (Housing) continue to

apply, including the requirement that the planning system provides ‘a sufficient quantity of housing taking into account need and demand and seeking to improve choice.’ (paragraph 10).

Chapter 4 of the SW RSS sets out the sub-regional policies for the region. Section 4.1.1 - 4.1.18 addresses the West of England Housing Market Area (HMA).

As the Proposed Changes to the RSS observed, the area exhibits many of the characteristics of a city-region. Bristol City would perform as the key regional economic driver for the region, with Bath playing a complementary role, not least in supporting some of Bristol’s growth. Reflecting the importance of the HMA to the future growth prospects of the region and employment, the West of England HMA was required to provide at least 137,950 homes over the plan period until 2026 with 21,300 apportioned to Bath and North East Somerset (B&NES).

Policy DW1: District wide spatial strategy

We were consequently disappointed to read that the Core Strategy is proposing to provide for only 11,000 additional homes between 2006 and 2026.

We submit that the Core Strategy is unsound because the target is unjustified.

The need for 21,300 homes in B&NES reflected the outcome of a lengthy public examination into the rate of household formation in the sub-region and recognition of its importance of the economy. The apportionment of this number of homes to B&NES reflected what was considered at the time as a sustainable number for the district, while also addressing housing need and demand.

It is also worthwhile noting that the new requirement of 11,000 homes is lower even than the figure of 15,500 submitted by the Regional Assembly for the draft RSS and the 11,600 recommended in Keith Woodhead’s report for the Council (B&NES Future Housing Growth Requirements to 2026: Stage 2 Report).

We submit that the proposed requirement of 11,000 homes is inadequate to address demand and consequently is unsound. Policy DW1 is unsound on the grounds that the departure from the SW RSS has not been adequately justified and because the Core Strategy ignores more recent evidence of housing need in the District over the plan period. The failure to provide the necessary number of new homes to meet emerging need also means that the Core Strategy will fail to comply with what is still national policy as set out in PPS3 to provide everyone with the opportunity of living in decent a home, which they can afford, in community where they want to live.

The need for new housing in the South West Region is critical. Housing starts across the region have collapsed. According to CLG figures (Table 231: permanent dwellings started by tenure and region) starts in the South West Region in 2007-08 were 18,960. These fell to 12,370 in 2009-10. According to research by the HBF this fall in housing starts equates to a loss of 9,885 directly employed construction jobs between 2007 and 2009 (Building a Recovery: how tackling the housing crisis can rebuild local economies across the country: HBF, December 2010).

Planning for the low number of homes proposed by the Core Strategy will contribute to restraining growth that might otherwise have occurred and will increase unemployment in the West of England housing market area. Neglecting the economic dimension and the links with housing would mean attaching little weight to the Government’s growth agenda, as set out in the HM Treasury and Department for Business Innovation and Skills document: The Path to Strong, Sustainable and Balanced Growth (HM Treasury/BIS, November 2010). The document cites the need for a planning regime that supports growth and sustainable development and that enables an increased supply of housing to meet the nation’s needs.

Future household projections: employment and population driven

Aside from the issue of non-conformity with the SW RSS the strategy is also unsound because it is not based on a credible evidence base to justify setting a lower requirement.

We understand that the Council's justification for this lower level of provision is driven by two key reports: the Business Growth and Employment Land Update by Roger Tym and Partners (RTP), and the B&NES Future Housing Growth Requirements to 2026 by Keith Woodhead. These documents have been used to justify a housing figure of 11,600 homes based upon 8,700 new jobs being created.

We would contend that the provision for just 8,700 new jobs is too pessimistic for a district such as B&NES which is experiencing high levels of demand. This level is in any case the lower level of the employment growth projected by RTP and by Keith Woodhead.

It is useful to note in this respect that the Secretary of State in the proposed changes to the SW RSS (supported by the Regional Economic Strategy) concluded that 592,460 additional dwellings were needed over the period to 2026 to support the plan's ambition to achieve a 3.2% level of economic growth per annum across the region. This level of economic growth depended on providing for higher levels of economic-led migration (see paragraph 2.19 on the Panel's report of the Examination in Public) and this required houses to be built in areas of high demand. The job growth figure associated with securing a 3.2% increase in growth was 465,000 jobs – a target far higher than the number of workers. Because B&NES has an ability to support higher economic growth as part of the West of England growth area, it was apportioned a higher level of housing than a strictly 'business as usual' case based on maintaining existing policy constraints scenario would indicate would be needed. We note that the RTP report makes the same observation when it states in paragraph 4.2 that future job growth is partly dependent on planning policy and housing land supply.

Even the 21,300 homes allocated for B&NES would have been modest, and fallen short of the number of homes needed to support a 3.2% level of growth across the growth area (it was apportioned 122,000 jobs between 2006-2026, averaging 6,100 per year with approximately 75% in the Bristol).

West of England Strategic Housing Market Assessment (SHMA)

Another important source of evidence of the level of housing need in the district would normally be the SHMA. Paragraphs 32 and 33 of PPS3 set out how in determining a level of housing provision local planning authorities should consider evidence in the local and sub-regional SHMA.

The West of England SHMA does not help in this respect as it appears to have ignored the question of market need entirely, addressing only affordable housing needs. We are unsure what the justification for this is but it may be because the SHMA was completed before the Coalition Government's changes to the planning system when it was assumed by the local authorities concerned that the overall level of need (market and affordable) was fixed by the RSS and consequently they need only identify the proportion of affordable homes needed against an upper ceiling fixed by the RSS. What is apparent, however, is that market issues are dealt with in a very cursory way in the document, using only price as an indicator. This of course helps in generating a higher affordable housing need, but neglects to quantify the extent of market need.

Having said this, the proposed target will still fail to address affordable housing needs, let alone address market requirements.

The West of England Strategic Housing Market Assessment, June 2009 version 2, table 4.11, shows that B&NES has a net annual need for 847 affordable homes per year for the period 2009-2021. This compares to the Core Strategy target of 11,000 new homes over the plan period, which would provide only an average 550 homes per year.

The SHMA identifies the need for 847 affordable homes per year from 2009 – 2021 (figure 20 of the West of England SHMA summary, page 36). If this target is applied over the 15 year plan period of the Core Strategy (2011-2026) this would equate to a requirement for 12,705 affordable homes (15 x 847).

The requirement for affordable housing alone, therefore, exceeds the total number of homes proposed in the plan, before the question of market needs is addressed. This simple calculation suggests that the district target is seriously misaligned when it comes to addressing local need and demand.

#### Jobs growth and household formation

As previously stated, the West of England SHMA appears to have neglected to address the question of market need. Given the absence of data in the SHMA which could help identify the number of market homes required we must turn to other information in the SHMA to provide a possible indication. The SHMA uses an adopted jobs growth figure of 2.8% (paragraph 1.4.5 of the main report) and the report uses this to inform its housing market assessment.

Keith Woodhead's report for B&NES (see B&NES Future Housing Growth Requirements to 2026: Stage 2 Report) estimates between 8,700 and 11,300 jobs being created. He then uses a ratio of 1.33 of a dwelling needed for each new job created (see paragraph 5.1.4 of the Woodhead report). Using this ratio and assuming a jobs growth rate of 10,000 (thus lying between the estimated ranges) this alone would generate the need for 13,300 dwellings alone. To this figure must be added additional allowances to account for the unmet needs of existing residents and those households moving to the area who may not be economically active or who will be commuters. We would submit that using the lower jobs growth figure to inform the housing need requirements is possibly overly pessimistic scenario. More to the point, the housing figure represents a significant departure from the findings of the SW RSS which in pursuing an employment growth target of 3.2% had generated a housing requirement of 21,300 net homes for the district.

Even were the Council to adopt a lower rate of growth – for example the compound rate of growth of 2.35% for the South West to 2026 as advocated by Oxford Econometrics (see page 4 of the recent report by the South West Observatory Economic Prediction and Planning Process: a contribution to the current debate about regional planning for housing need after the recession (South West Observatory, January 2011) then this still represents 80% of the pre-recession trend in growth. As the South West Observatory comment on page 4, even at this lower rate of growth, this would only justify a reduction in local housing targets of up to 20%, not the 50% being proposed here. Moreover, the 20% reduction that might be justified, would only relate to the house building component that is related to economic activity and jobs growth, it would not relate to other sources of household growth, such as (a) in-migration; (b) household formation, age distribution and longevity; © social policy requirements such as affordable housing.

Given that the Keith Woodhead report acknowledges that B&NES' proposed housing requirement will fail to address the affordable housing need of 850 homes per year as identified in the SHMA (see the Executive summary of the report) and because the SHMA fails to calculate the extent of market need, we submit that the housing requirement is wholly unsatisfactory.

If B&NES is now retreating from an economic growth agenda then this should be made more explicit in the Core Strategy as this will have an important bearing on the Local Enterprise Partnership and its growth agenda for the West of England.

We also challenge the short-term pessimist economic outlook that has informed this lower level of provision. This suggests that the Council is planning for recession rather than utilising the planning tools available to it to promote growth and support the regional economy. If B&NES is now preparing to close its borders and retreat into autarky then the Core Strategy should be clear about this so that investment can flow elsewhere and the Local Enterprise Partnership made aware. Achieving a 3.2% level of growth may be regarded by some as unrealistic at the present time but the livelihoods of many people depend upon concerted action by public and private sector partners to try and achieve this. The pursuit of ambitious goals should not be confined to the setting of environmental targets alone.

#### CLG household projections

The other element to consider is the most recent CLG household projections. The 2008 based projection shows an increase of 16,000 households in the period 2006-2026. This represents a decrease from the 2006 based projection which had indicated an increase of 19,000 households for the same period. Despite the decrease, this still indicates a level of provision that is significantly above the 11,000 target.

#### Backlog

In identifying a housing requirement, the District will need to address the question of backlog.

The CLG housing completions data for B&NES (housing table 253: permanent dwellings started and completed by tenure and district) provides the following number of completions in B&NES over the last six years:

#### Year Completions

2004-05 220

2005-06 220

#### RSS annual average

applied from 2006 Deficit

2006-07 190 1,065 875

2007-08 190 1,065 875

2008-09 170 1,065 895

2009-10 240 1,065 825

Total 790 4,260 3,470

Source: CLG: housing table 253: permanent dwellings started and completed by tenure and district

The commencement date for the B&NES Core Strategy is 2006.

The SW RSS establish an annual average requirement of 1,065 homes per year. Since 2006-07 just 790 dwellings have been completed compared to the 4,260 homes that would need to have been built to meet the annual average target. This shows a deficit of 3,470 homes that should be taken into account when establishing a new housing requirement.

#### Impact of migration

The CLG household projection is based on five year migration trends. The most recent migration data from Government, however, post-dates the 2008 based household projections, but indicates that net-migration out of the UK was lower than previously expected.

The Migration Statistics for 2009 (Migration Statistic Quarterly Report: ONS, November 2010), published in November 2010, shows that fewer people left the UK than arrived to live (an estimated 368,000 people emigrated from the UK in 2009, compared to an estimated 567,000 people arriving). This counters the argument that district housing requirements can be reduced because the impact of the European recession will result in fewer new in-migrants. The argument assumed that out-migration from the UK would continue at the same rate as before, when in many respects, the UK continues to be a relatively attractive destination for many and/or opportunities for work contract in the rest of Europe. Indeed, some commentators are expecting a new exodus from the Republic of Ireland.

Section 5 of the Migration Statistic Quarterly Report: ONS, November 2010 shows that in the year 2009-2010 the South West is experiencing the largest net inflow of people (19,200) after the South East region (21,900). The South East region is a populous and economically dynamic region where most population and household formation is internally generated. By contrast it has historically been the case that the South West's internal population growth has largely remained static and in-migration has been an important component of household formation in the region and providing its labour supply.



This point is reinforced in the recent report by the South West Observatory (Economic Prediction and Planning Process: a contribution to the current debate about regional planning for housing need after the recession, South West Observatory, January 2011). On page 3 of the report it considers the degree to which people will have left the region owing to the recession, and the implications for any accumulated backlog in under-provision. Drawing on research by Oxford Economics to inform the South West Growth Scenarios, the report observes:

“One unknown here is the net number of people, if any, who will have left the region during the downturn. Oxford Economics’ take on this is that the rate of in-migration does fall over the recession but it does not turn negative, chiefly because the region’s relative attractiveness for migrants has not necessarily diminished relative to alternatives. If that is the case, then future housing growth needs to be greater than a point relationship with economic growth would suggest in order to clear the extant back-log.”

It is also important to note that planning policies constraining growth across the South West region will have probably dampened levels of in-migration, population and household growth than would otherwise have been the case.

One should conclude from this that these long term migration trends can be expected to continue. This will result in greater housing stress within B&NES unless a higher housing requirement is identified.

Wider economic implications

The Core Strategy is unsound because it is based upon an unjustified economic scenario. Moreover, it is ineffective in assuming that it can do nothing to reverse this trend.

Planning for lower levels of housing delivery than indicated by the SW RSS and the household projections will not support economic recovery. Local authorities need to accept their responsibilities by facing-up to the housing supply crisis, and begin planning sensibly to meet housing need and demand. Planning is about the long term. We would submit that it would be unsound to base the district’s 20 year plan on today’s low levels of activity. This is to plan for recession and to build recessionary assumptions into planning.

As the West of England SHMA observes in paragraph 2.8.1

“The WoE HMA is a relatively prosperous area with a diverse economic base. It needs to retain its population to contribute to the wider local economy and to ensure that lack of housing does not begin to cause labour shortages potentially threatening the competitiveness of the area. The growth of longer distance car commuting is ultimately unsustainable in its impact on the local environment and its contribution towards congestion. Future housing supply strategies need to recognise these wider impacts and seek to maximise completions within the existing stock and on new sites within the sub-region close to economic centres.

“Diagram 4: Distribution in the district

The Core Strategy is unsound because it is not consistent with the RSS in seemingly axing a swathe of provision in Area of Search 1B and it will prove ineffective because it assumes there is sufficient capacity within Bath to accommodate much of the district’s needs on previously developed land rather than in part through an urban extension.

It would appear from Diagram 4 that the allocation for Keynsham has been reduced by half (3,000 to 1,500) while the Area of Search 1B which had allocated 9,500 homes has been lost altogether from this plan.

Although the planned level of provision for the city of Bath remains the same at 6,000 we note that the

urban extension that had been proposed in the RSS has been lost. This raises doubts about the capacity of the town of Bath to provide for these homes on previously developed land. There are a numbers of problems that attend development on brownfield sites, one of which is local misgivings regarding intensification ('town cramming'), which might mean that though this is the Council's preferred approach, it may encounter greater local resistance.

**Change sought to make sound:** The Core Strategy must plan for a higher level of economic and housing growth

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 245\2 S

**Respondent:** Environment Agency

**Representation (soundness):** We support the inclusion in Policy DW1 of the need to protect the district's biodiversity resource, as well as enhancement and habitat creation highlighted elsewhere in the Core Strategy. We are also pleased to see that the need to ensure infrastructure is aligned to new development has been highlighted. We support the inclusion of waste water infrastructure as key infrastructure needed to deliver Policy DW1. Sewage treatment work capacity and the associated infrastructure (e.g. sewers) will need to be upgraded in Bath, Keynsham, Midsomer Norton and Radstock if new development is going to be accommodated.

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

**Representation (legal compliance):**

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

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**Reference:** 250\1

**Respondent:** Somerset County Council

**Representation (soundness):** The concern of adjoining councils, including Somerset, that B&NES should provide for its housing need to avoid pressure on neighbouring localities has been noted by B&NES in the Council's Consultation Report on the Core Strategy Spatial Options Document Consultation. B&NES has responded with a review of the land needed for development in light of revised prospects for economic and household growth, taking account of the impact of the recent economic recession, changes in the local economy and revised population projections.

Somerset County Council does not seek to assert that the Core Strategy is unsound but does anticipate that the fundamental matter of the scale and broad location of land, which should be provided for development, will be considered by the Inspector.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 251\2

**Respondent:** Bovis Homes

**Representation (soundness):** Bovis Homes wishes to draw attention to the other representations submitted by Barton Willmore.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 261\3 S

**Respondent:** RUH NHS Trust

**Representation Objectives**

**(soundness):**

Objective 6 includes the need to ensure the timely provision of social and physical infrastructure, including health facilities. The Trust fully supports this particular objective and the Policy DW1 that seeks to ensure that infrastructure is aligned with new development and the statement at DW1.4.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 292\12

**Respondent:** Bath Avon River Corridor Group

**Representation** Policy CP2 p107 There should be a policy recognising the importance of 'spatial sustainability' the

**(soundness):** burden of carbon inherent in established high carbon transportation models and how different spatial relationships between work, home and other uses can be changed.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 310\1 S

**Respondent:** The Initiative

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

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

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

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

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 310\2 S

**Respondent:** The Initiative

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

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

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

2. We note the reduction in the proposed numbers of jobs and houses compared to previous estimates and despite them being unambitious, we consider them acceptable as an absolute minimum. Ideally,

they will be surpassed, but on no account should we fall short of delivering them and there must be no allowance for resting on laurels once 60% or 70% is achieved.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 323\3

**Respondent:** Mr and Mrs Tudgee

**Representation** 2.0 DISTRICT-WIDE SPATIAL STRATEGY

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

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

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

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 326\1 S

**Respondent:** Patricia Pick

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt

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

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

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

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

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

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 327\1 S

**Respondent:** Susan Thatcher

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

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

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

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

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

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 328\1 S

**Respondent:** David Reeve

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

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 329\1 S

**Respondent:** Barbara Reeve

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 330\1 S

**Respondent:** Norman Bellworthy

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 331\1 S

**Respondent:** Jean Bellworthy

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 332\1 S

**Respondent:** Nicholas Owen

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 333\1 S

**Respondent:** Sandra Webb

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 334\1 S

**Respondent:** T. Davies

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 335\1 S

**Respondent:** Jennifer Davies

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 336\1 S

**Respondent:** Muriel Gibbs

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

---

**Reference:** 337\1 S

**Respondent:** R. Studley

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 338\1 S

**Respondent:** A.J. Studley

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 339\1 S

**Respondent:** Susan Maggs

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 340\1 S

**Respondent:** Charlotte Maggs

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 341\1 S

**Respondent:** Terence Wittner

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 342\1 S

**Respondent:** Jason Stone

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 343\1 S

**Respondent:** D. Peacey

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 344\1 S

**Respondent:** M. Peacey

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 345\1 S

**Respondent:** Beatrix Vasarhelyi

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 346\1 S

**Respondent:** J. Keep

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 347\1 S

**Respondent:** James Lawson

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 348\1 S

**Respondent:** E. Webb

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 349\1 S

**Respondent:** Janet Webb

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 350\1 S

**Respondent:** Susan Palmer

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 351\1 S

**Respondent:** R. Palmer

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 352\1 S

**Respondent:** Richard Hall

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 353\1 S

**Respondent:** Angela Hall

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 354\1 S

**Respondent:** R Penney

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 355\1 S

**Respondent:** P Penney

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 356\1 S

**Respondent:** Peter Goodwin

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

---

**Reference:** 357\1 S

**Respondent:** Anita Goodwin

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 358\1 S

**Respondent:** Clive Powell

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 359\1 S

**Respondent:** J.E. Powell

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 360\1 S

**Respondent:** S. Evans

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 361\1 S

**Respondent:** Sylvia Cox

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 362\1 S

**Respondent:** Mervyn Cox

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 363\1 S

**Respondent:** James Thrower

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

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**Representation (legal compliance):**

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**Reference:** 364\1 S

**Respondent:** Joyce Thrower

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**Change sought to  
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**Representation (legal compliance):**

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**Reference:** 365\1 S

**Respondent:** N. Farrance

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 366\1 S

**Respondent:** Diana Farrance

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**Representation (legal compliance):**

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**Reference:** 367\1 S

**Respondent:** Trevor Davis

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**Reference:** 368\1 S

**Respondent:** Sheila Davis

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**Reference:** 369\1 S

**Respondent:** Anne Griffin

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**Reference:** 370\1 S

**Respondent:** David Whelan

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**Reference:** 371\1 S

**Respondent:** June Carter

**Representation** I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt  
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**Reference:** 373\1 S

**Respondent:** Ann Marshall

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt  
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**Reference:** 374\1 S

**Respondent:** Graham Carter

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**Reference:** 375\1 S

**Respondent:** F. Box

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**Reference:** 376\1 S

**Respondent:** J. Edwards

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**Reference:** 377\1 S

**Respondent:** Judith Edwards

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**Change sought to  
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**Reference:** 378\1 S

**Respondent:** Lilian Hayward

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**Reference:** 379\1 S

**Respondent:** Michael Searle

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**Reference:** 380\1 S

**Respondent:** Molly Ford

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt  
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**Reference:** 381\1 S

**Respondent:** M.A. Ford

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**Reference:** 382\1 S

**Respondent:** Dennis Gould

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**Reference:** 383\1 S

**Respondent:** Pamela Gould

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 384\1

**Respondent:** Wiltshire Council

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

**Sub-regional context**

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

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

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

The functional relationships that exist between Wiltshire and B&NES requires cross boundary solutions. The Wiltshire 2026: Planning For Wiltshire's Future (Consultation document to inform the Wiltshire Core Strategy) was subject to public consultation at the end of 2009. This document recognises the wider sub-regional context and the functional relationships that exist between

settlements within Wiltshire and neighbouring authorities. In particular it acknowledges that Trowbridge and surrounding areas see approximately 7,000 people out commute to centres such as Bath and Bristol. The Wiltshire Core Strategy is currently being prepared and will support housing and employment growth to reduce out-commuting however it recognises that such objectives can only be met by working closely with neighbouring authorities.

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

### Housing Requirement

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

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

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

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

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

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

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

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

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

of jobs and workers, and address the needs of households on the housing register.”

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

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

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

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 385\1 S

**Respondent:** Desmond Westlake

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

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**Reference:** 386\1 S

**Respondent:** Tony Smith

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**Reference:** 387\1 S

**Respondent:** Wendy Smith

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**Reference:** 388\1 S

**Respondent:** Natasha Morgan

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**Reference:** 389\1 S

**Respondent:** Nathan Morgan

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**Reference:** 390\1 S

**Respondent:** Kim Thomas

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**Reference:** 391\1 S

**Respondent:** M.Thomas

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**Change sought to make legally compliant:**

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**Reference:** 392\1 S

**Respondent:** S. Jewell

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 393\1 S

**Respondent:** V. Perry

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

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 394\1 S

**Respondent:** Keith Perry

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 395\1 S

**Respondent:** P.G.Cook

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 397\1

**Respondent:** Stokefield Trust

**Representation** The District-wide spatial strategy is now based on the Council's own assessment of growth targets  
**(soundness):** based on local needs and circumstances. As a result, the Core Strategy now makes provision for around 11,000 new homes in the district for the period 2006 – 2026, down from 21,300 in the

Secretary of State's Proposed Modifications to the RSS. Bath and North East Somerset Council has provided little evidence to support its revised housing figure, and it is considered that such a dramatic reduction in the number of dwellings to be provided will lead to affordability problems and social and economic issues associated with the lack of housing.

**Change sought to make sound:** Increase the number of dwellings to be provided in the district for the period 2006 – 2026 in line with the Secretary of State's Proposed Modifications.

**Representation (legal compliance):** The Core Strategy fails to take due account of the growth figures set out in the Secretary of State's Proposed Modifications to the RSS (July 2008) which, unless/until revoked by the Localism Bill, remain a material consideration in the preparation of the LDF.

**Change sought to make legally compliant:** Take due account of the growth figures set out in the Secretary of State's Proposed Modifications to the RSS.

---

**Reference:** 402\1 S

**Respondent:** L Fennelly

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 403\1 S

**Respondent:** S Jewell

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 404\1 S

**Respondent:** S Fennelly

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 405\1 S

**Respondent:** Richard Sweet

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 406\1 S

**Respondent:** Janet Sweet

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 407\1 S

**Respondent:** Charles Luker

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 408\1 S

**Respondent:** P Walsh

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 409\1 S

**Respondent:** Angela Sims

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 410\1 S

**Respondent:** Bernard Sims

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 411\1 S

**Respondent:** Caroline Walsh

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 412\1 S

**Respondent:** Jason Clark

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 413\1 S

**Respondent:** Jessica Clark

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 414\1 S

**Respondent:** D J Clark

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 415\1 S

**Respondent:** B Clark

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 416\1 S

**Respondent:** James O'Connell

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 417\1 S

**Respondent:** Penny O'Connell

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 418\1 S

**Respondent:** J H Sobey

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

---

**Reference:** 419\1 S

**Respondent:** J Dalton

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 420\1 S

**Respondent:** Alan Dalton

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 421\1 S

**Respondent:** Lisa Smith

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 422\1 S

**Respondent:** A R Smith

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 423\1 S

**Respondent:** Kevin Purnell

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 424\1 S

**Respondent:** K Purnell

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 425\1 S

**Respondent:** J Purnell

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 426\1 S

**Respondent:** Harry Purnell

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 427\1 S

**Respondent:** Matthew Wilkes

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 428\1 S

**Respondent:** Nathan Wilkes

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 429\1 S

**Respondent:** Adrian Wilkes

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

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 430\1 S

**Respondent:** Susan Wilkes

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

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 431\1 S

**Respondent:** Cherrri Leando

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 432\1 S

**Respondent:** J Leando

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 433\1 S

**Respondent:** Selena Norfolk

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 434\1 S

**Respondent:** Elizabeth Cox

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 435\1 S

**Respondent:** Rachel Davis

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 436\1 S

**Respondent:** Trevor Hicks

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 437\1 S

**Respondent:** Michelle Bane

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 438\1 S

**Respondent:** Colin Willis

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 439\1 S

**Respondent:** A M Willis

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 440\1 S

**Respondent:** Carol Carter

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 441\1 S

**Respondent:** Ruth Wilmot

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 442\1 S

**Respondent:** Royston Wilmot

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 443\1 S

**Respondent:** Marianne Britten

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 444\1 S

**Respondent:** Rosemary Gullis

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 445\1 S

**Respondent:** L S Carter

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 446\1 S

**Respondent:** Alfred Leonard

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 447\1 S

**Respondent:** June Leonard

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 448\1 S

**Respondent:** Jennifer Barker

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 449\1 S

**Respondent:** Acker Bilk

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 450\1 S

**Respondent:** Paul Bishop

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 451\1 S

**Respondent:** Mrs G Bishop

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 452\1 S

**Respondent:** Mr G Bishop

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 453\1 S

**Respondent:** Antony Godfrey

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 454\1 S

**Respondent:** Tanya Mabbs-Godfrey

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 455\1 S

**Respondent:** Steve Barker

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 456\1 S

**Respondent:** Jean Bilk

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 457\1 S

**Respondent:** Serena Bishop

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 458\1 S

**Respondent:** Nathan Mabbs-Godfrey

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 459\1 S

**Respondent:** Mrs N. R. Hill

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 460\1 S

**Respondent:** J Green

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 461\1 S

**Respondent:** David Green

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 462\1 S

**Respondent:** Dennis Baber

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 463\1 S

**Respondent:** Jane Barber

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 464\1 S

**Respondent:** Louisa Baber

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 465\1 S

**Respondent:** Robert Whiting

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 466\1 S

**Respondent:** W. J. Lacey

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 467\1 S

**Respondent:** K. J.. Lacey

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 468\1 S

**Respondent:** Barbara Clarke

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 469\1 S

**Respondent:** B Davis

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 470\1 S

**Respondent:** Sylvia Davis

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 471\1 S

**Respondent:** Geoff Carpenter

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 472\1 S

**Respondent:** Rachael Carpenter

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

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 473\1 S

**Respondent:** J Carpenter

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 474\1 S

**Respondent:** Gerald Smith

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 475\1 S

**Respondent:** Susan Smith

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 476\1 S

**Respondent:** D Milkins

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

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

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make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 477\1 S

**Respondent:** R Milkins

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 478\1 S

**Respondent:** Deborah Fletcher

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 479\1 S

**Respondent:** Andrew Fletcher

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 480\1 S

**Respondent:** Olive Jones

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 481\1 S

**Respondent:** Julie Filer

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 482\1 S

**Respondent:** Tony Filer

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 483\1 S

**Respondent:** Margaret Foxwell

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

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 484\1 S

**Respondent:** David E. Foxwell

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 485\1 S

**Respondent:** Brian Worlock

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

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**Reference:** 486\1 S

**Respondent:** Janet Worlock

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

**Change sought to make legally compliant:**

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**Reference:** 487\1 S

**Respondent:** Allan Price

**Representation** I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to make legally compliant:**

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**Reference:** 488\1 S

**Respondent:** Joyce Price

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

**Change sought to make legally compliant:**

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**Reference:** 489\1 S

**Respondent:** A Bates

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 490\1 S

**Respondent:** J Bates

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 491\1 S

**Respondent:** E. P. Willington

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 492\1 S

**Respondent:** Mrs P. C. Tichborne

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

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 493\1 S

**Respondent:** F. G. Tichborne

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 494\1 S

**Respondent:** P Reynolds

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 495\1 S

**Respondent:** P Reynolds

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 496\1 S

**Respondent:** Richard Harrison

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

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 497\1 S

**Respondent:** Linda Harrison

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

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 498\1 S

**Respondent:** Mr David Lewis

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

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**Change sought to  
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**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 499\1 S

**Respondent:** Mrs Tracey Lewis

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 500\1 S

**Respondent:** Colin Taylor

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 501\1 S

**Respondent:** Cheryl Taylor

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 502\1 S

**Respondent:** Patience Campbell

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 503\1 S

**Respondent:** Michael Campbell

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 504\1 S

**Respondent:** Jeremy Cox

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 505\1 S

**Respondent:** Hilary Cox

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 506\1 S

**Respondent:** Heather Davis

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 507\1 S

**Respondent:** John Davis

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 508\1 S

**Respondent:** Olivia Norfolk

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 509\1 S

**Respondent:** Andrew Ford

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 510\1 S

**Respondent:** Allan Peters

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 511\1 S

**Respondent:** James Peters

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 512\1 S

**Respondent:** J. Roach

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 513\1 S

**Respondent:** Peter Roach

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 514\1 S

**Respondent:** A Bishop

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 515\1 S

**Respondent:** T. E. Stokes

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 516\1 S

**Respondent:** T. J. Stokes

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 517\1 S

**Respondent:** W. J. Rose

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 518\1 S

**Respondent:** Tony Griffith

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 519\1 S

**Respondent:** Judith Griffith

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 520\1 S

**Respondent:** The Rev'd John W. Masding

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 521\1 S

**Respondent:** Margaret Masding

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 522\1 S

**Respondent:** J. G. Slade

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 523\1 S

**Respondent:** D. H. Slade

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 524\1 S

**Respondent:** Mrs B. J. Osborne

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 525\1 S

**Respondent:** Marina Norris

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 526\1 S

**Respondent:** Janet Russ

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 527\1 S

**Respondent:** Michael Russ

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 528\1 S

**Respondent:** Neil Davies

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

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 529\1 S

**Respondent:** Miguel Humblet

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 534\1 S

**Respondent:** Carolyn Brennan

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 535\1 S

**Respondent:** Melanie Crane

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 537\1 S

**Respondent:** Jonathan Crane

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 538\1 S

**Respondent:** F. Barton

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 539\1 S

**Respondent:** K. E. Barton

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 540\1 S

**Respondent:** Mrs B Jones

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt  
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Page 20, Policy DW1, Para 3 - Using Brownfield sites as a priority for new housing is sound.

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 541\1 S

**Respondent:** Mr G Jones

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

**Change sought to make legally compliant:**

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**Reference:** 542\1 S

**Respondent:** M. Norman

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

**Change sought to make legally compliant:**

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**Reference:** 543\1 S

**Respondent:** Mary Clark

**Representation** I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 544\1 S

**Respondent:** T. Clark

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

**Change sought to make legally compliant:**

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**Reference:** 545\1 S

**Respondent:** E. O'Regan

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

**Change sought to make legally compliant:**

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**Reference:** 546\1 S

**Respondent:** G. O'Regan

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 547\1 S

**Respondent:** Sally Paul

**Representation** I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 548\1 S

**Respondent:** Cllr Peter Edwards

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 549\1 S

**Respondent:** Ann Edwards

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 550\1 S

**Respondent:** D. L. Pearce

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 551\1 S

**Respondent:** M. L. Pearce

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 552\1 S

**Respondent:** Peter Smith

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 553\1 S

**Respondent:** J. R. Smith

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 554\1 S

**Respondent:** J. Payne

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

**Change sought to make legally compliant:**

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**Reference:** 555\1 S

**Respondent:** Kim Payne

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt  
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**Reference:** 556\1 S

**Respondent:** Christine Saunders

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt  
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**Reference:** 557\1 S

**Respondent:** Barrie Saunders

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

**Change sought to make legally compliant:**

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**Reference:** 558\1 S

**Respondent:** S J E Thomas

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

**Change sought to make legally compliant:**

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**Reference:** 559\1 S

**Respondent:** Mary Thomas

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

**Change sought to make legally compliant:**

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**Reference:** 560\1 S

**Respondent:** Denise Rhodes

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

**Change sought to make legally compliant:**

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**Reference:** 561\1 S

**Respondent:** Philip Young

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

**Change sought to make legally compliant:**

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**Reference:** 562\1 S

**Respondent:** C I Young

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

**Change sought to make legally compliant:**

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**Reference:** 563\1 S

**Respondent:** P A Hill

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



**Change sought to make legally compliant:**

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**Reference:** 564\1 S

**Respondent:** Janet Head

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 565\1 S

**Respondent:** N J Head

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

**Change sought to make legally compliant:**

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**Reference:** 566\1 S

**Respondent:** Jennifer Skuse

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 567\1 S

**Respondent:** Anthony Skuse

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 568\1 S

**Respondent:** S D Matthews

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 569\1 S

**Respondent:** J Nethercott

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 570\1 S

**Respondent:** Joyce Williams

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 571\1 S

**Respondent:** Brian Ogborne

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 572\1 S

**Respondent:** Patricia Ogborne

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 573\1 S

**Respondent:** Kirstie Towe

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 574\1 S

**Respondent:** Nicholas Towe

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 575\1 S

**Respondent:** Paul Hammerenn

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 576\1 S

**Respondent:** Ann Summers

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 577\1 S

**Respondent:** Martyn Summers

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 578\1 S

**Respondent:** B L Hauser

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 579\1 S

**Respondent:** Mary Hauser

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 580\1 S

**Respondent:** Louise Western

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 581\1 S

**Respondent:** Craig Western

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 582\1 S

**Respondent:** R Tucker

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 583\1 S

**Respondent:** A Tucker

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

---

**Reference:** 584\1 S

**Respondent:** J Bethell

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 585\1 S

**Respondent:** A Bethell

**Representation** I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 586\1 S

**Respondent:** Martin Parry

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 587\1 S

**Respondent:** Susan Parry

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 588\1 S

**Respondent:** Mrs N W Wiggins

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 589\1 S

**Respondent:** Ruth Osborne

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 590\1 S

**Respondent:** L G Osborne

**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):**

**Change sought to make legally compliant:**

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**Reference:** 591\1 S

**Respondent:** S Gunter-Phillips

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

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**Change sought to make legally compliant:**

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**Reference:** 592\1 S

**Respondent:** C Gunter-Phillips

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

**Change sought to make legally compliant:**

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**Reference:** 593\1 S

**Respondent:** B Webb

**Representation** I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 594\1 S

**Respondent:** Keith Webb

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 595\1 S

**Respondent:** David Bennett

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 596\1 S

**Respondent:** M Bennett

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 597\1 S

**Respondent:** J P Howard

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 598\1 S

**Respondent:** P B Howard

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

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 599\1 S

**Respondent:** Avril Backwell

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 600\1 S

**Respondent:** Alan Backwell

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 601\1 S

**Respondent:** Janet Wilmshurst

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 602\1 S

**Respondent:** L J Wilmshurst

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 603\1 S

**Respondent:** Margaret Stone

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

---

**Reference:** 604\1 S

**Respondent:** Raymond Stone

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 605\1 S

**Respondent:** J A Phillips

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 606\1 S

**Respondent:** D Phillips

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 607\1 S

**Respondent:** L Tucker

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 608\1 S

**Respondent:** Jason Stevens

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 609\1 S

**Respondent:** Tracey Stevens

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 610\1 S

**Respondent:** Lorraine Coombes

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 611\1 S

**Respondent:** M A Greatbanks

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 612\1 S

**Respondent:** A E F Quinn

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 613\1 S

**Respondent:** L M Quinn

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

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 614\1 S

**Respondent:** M Subow

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 615\1 S

**Respondent:** Ceri Giles

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 616\1 S

**Respondent:** James Giles

**Representation** I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 617\1 S

**Respondent:** Darren Broomfield

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

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 618\1 S

**Respondent:** H C Broomfield

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 619\1 S

**Respondent:** Audrey Tovey

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 620\1 S

**Respondent:** H A Greatbanks

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 621\1 S

**Respondent:** I P Greatbanks

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 622\1 S

**Respondent:** B J Gitsham

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

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 623\1 S

**Respondent:** C M Gitsham

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



**Change sought to make legally compliant:**

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**Reference:** 624\1 S

**Respondent:** Audrey Cowley

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

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**Representation (legal compliance):**

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**Reference:** 625\1 S

**Respondent:** Audrey Ashton

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

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**Reference:** 626\1 S

**Respondent:** S P Spencer

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

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**Change sought to make legally compliant:**

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**Reference:** 627\1 S

**Respondent:** Jennifer Eaton

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 628\1 S

**Respondent:** Richard Eaton

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 629\1 S

**Respondent:** Richard Woodbridge

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

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

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**Reference:** 630\1 S

**Respondent:** Pamela Woodbridge

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to make legally compliant:**

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**Reference:** 631\1 S

**Respondent:** R G Miles

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

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

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**Reference:** 632\1 S

**Respondent:** Ena Miles

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 633\1 S

**Respondent:** Jean Francis

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 634\1 S

**Respondent:** B Spragg

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 635\1 S

**Respondent:** David Ballinger

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 636\1 S

**Respondent:** Rosemary Ballinger

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 637\1 S

**Respondent:** D Finnemore

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 638\1 S

**Respondent:** Judith Finnemore

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

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**Change sought to make legally compliant:**

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**Reference:** 639\1 S

**Respondent:** C Carter

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 640\1 S

**Respondent:** F J Carter

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 641\1 S

**Respondent:** Mrs P J Melrose

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 642\1 S

**Respondent:** Caroline Stewart

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 643\1 S

**Respondent:** Janet Ogilvie

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 644\1 S

**Respondent:** S Rawlings

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 645\1 S

**Respondent:** Lizz Rawlings

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 646\1 S

**Respondent:** Roger Webster

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 647\1 S

**Respondent:** M Webster

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 648\1 S

**Respondent:** Peter Glirton

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 649\1 S

**Respondent:** Gloria Glirton

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 650\1 S

**Respondent:** V J Tattersall

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 651\1 S

**Respondent:** G A Tattersall

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 652\1 S

**Respondent:** Mrs J S Gwyther

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 653\1 S

**Respondent:** David Gwyther

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 654\1 S

**Respondent:** Mark Crane

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 655\1 S

**Respondent:** Sylvia Clements

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 656\1 S

**Respondent:** Julie Tooze

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 657\1 S

**Respondent:** Andrew Tooze

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 658\1 S

**Respondent:** Evelyn Read

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 659\1 S

**Respondent:** Gareth Read

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 660\1 S

**Respondent:** Jean Miles

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 661\1 S

**Respondent:** S Hucker

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

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 662\1 S

**Respondent:** A Hucker

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 663\1 S

**Respondent:** Mrs J M Jewell

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 664\1 S

**Respondent:** G M Daniel

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 665\1 S

**Respondent:** Nicholas Mansfield

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 667\1 S

**Respondent:** Jean Mansfield

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 668\1 S

**Respondent:** J Hampton

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 669\1 S

**Respondent:** G Knighton

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 670\1 S

**Respondent:** M Knighton

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 671\1 S

**Respondent:** Paul Smith

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 672\1 S

**Respondent:** Sandie-Jay Smith

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 673\1 S

**Respondent:** Mrs N Smith

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 674\1 S

**Respondent:** Shane Smith

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 675\1 S

**Respondent:** Rebecca Demytruk

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 676\1 S

**Respondent:** Justin Jones

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 677\1 S

**Respondent:** M J Squire

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 678\1 S

**Respondent:** Carol Squire

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 679\1 S

**Respondent:** P Hieron

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 680\1 S

**Respondent:** Rosemary Hieron

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 681\1 S

**Respondent:** J Stout

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 682\1 S

**Respondent:** Keith Stout

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 683\1 S

**Respondent:** Rosemary Davis

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 684\1 S

**Respondent:** David Spear

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 685\1 S

**Respondent:** Bernard Coles

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 686\1 S

**Respondent:** Gillian Coles

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 687\1 S

**Respondent:** Harold Gully

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

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**Change sought to  
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**Representation (legal compliance):**

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**Reference:** 688\1 S

**Respondent:** J E A Gully

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 689\1 S

**Respondent:** Lionel Webb

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 690\1 S

**Respondent:** Ann Webb

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 691\1 S

**Respondent:** Mrs Bernice Parsons

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 692\1 S

**Respondent:** Mr Keith Parsons

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 693\1 S

**Respondent:** S Gunton

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

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**Reference:** 694\1 S

**Respondent:** Mrs J Gunton

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

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**Reference:** 695\1 S

**Respondent:** T K Banks

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

**Change sought to make legally compliant:**

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**Reference:** 696\1 S

**Respondent:** S Banks

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 697\1 S

**Respondent:** Maureen Hawkins

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 698\1 S

**Respondent:** Roger Hawkins

**Representation** I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 699\1 S

**Respondent:** Angela Prescott

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 700\1 S

**Respondent:** Neil Prescott

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 701\1 S

**Respondent:** Lucinda Blurton

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 702\1 S

**Respondent:** John Blurton

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 703\1 S

**Respondent:** Mr R A Fricker

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 704\1 S

**Respondent:** Josephine Pike

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 705\1 S

**Respondent:** Derek Pike

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

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 706\1 S

**Respondent:** Brian Vowles

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

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 707\1 S

**Respondent:** Angela Vowles

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 708\1 S

**Respondent:** Peter Leavey

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 709\1 S

**Respondent:** Mrs W D Green

**Representation** I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 710\1 S

**Respondent:** Mr M Green

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 711\1 S

**Respondent:** Mrs W D Green

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 712\1 S

**Respondent:** Julie Williams

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 713\1 S

**Respondent:** Michael Williams

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 714\1 S

**Respondent:** Mrs Y J Daniell

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 715\1 S

**Respondent:** John Frape

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 716\1 S

**Respondent:** Janet Frape

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 717\1 S

**Respondent:** Terrence Gerrish

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 718\1 S

**Respondent:** June Gerrish

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 719\1 S

**Respondent:** Mr P R James

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 720\1 S

**Respondent:** R H Bamford

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 721\1 S

**Respondent:** Janet Harding

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 722\1 S

**Respondent:** Beverley Harding

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 723\1 S

**Respondent:** Shirley Britton

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 724\1 S

**Respondent:** Walter Britton

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 725\1 S

**Respondent:** G Ridley

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 726\1 S

**Respondent:** M Ridley

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 727\1 S

**Respondent:** Patricia Martin

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 728\1 S

**Respondent:** Allan Martin

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 729\1 S

**Respondent:** Pearl Meredith

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 730\1 S

**Respondent:** A T Broad

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 731\1 S

**Respondent:** B A Leach

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 732\1 S

**Respondent:** Mrs M J Thomas

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 733\1 S

**Respondent:** S W Thomas

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 734\1 S

**Respondent:** A Markey

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 735\1 S

**Respondent:** Christopher Markey

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 736\1 S

**Respondent:** G E Allward

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 737\1 S

**Respondent:** C J Allward

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 738\1 S

**Respondent:** T J Allward

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 739\1 S

**Respondent:** C Allward

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 740\1 S

**Respondent:** Paul Ollis

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

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 741\1 S

**Respondent:** A Ollis

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 742\1 S

**Respondent:** P Gardiner

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 743\1 S

**Respondent:** G R Gardiner

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 744\1 S

**Respondent:** G Foster

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

---

**Reference:** 745\1 S

**Respondent:** A Francomb

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 746\1 S

**Respondent:** Mrs A J Francomb

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 747\1 S

**Respondent:** David Meredith

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 748\1 S

**Respondent:** J Meredith

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 749\1 S

**Respondent:** Gwendoline Hill

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 750\1 S

**Respondent:** A White

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 751\1 S

**Respondent:** John Winter

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 752\1 S

**Respondent:** Frank Evey

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 753\1 S

**Respondent:** M D Coleman

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 754\1 S

**Respondent:** J H Coleman

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 755\1 S

**Respondent:** Mrs P A Barrett

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 756\1 S

**Respondent:** Mr G A Barrett

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 757\1 S

**Respondent:** B E Rosenthal

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 758\1 S

**Respondent:** John Rosenthal

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 759\1 S

**Respondent:** Stephen Johnson

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 760\1 S

**Respondent:** Judith Johnson

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 761\1 S

**Respondent:** Frank Lewis

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 762\1 S

**Respondent:** Margaret Lewis

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to make legally compliant:**

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**Reference:** 763\1 S

**Respondent:** Leonard Wills

**Representation** I am pleased to write endoresing the Draft Core Strategy which now protects the Green Belt  
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make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 764\1 S

**Respondent:** Linda Wills

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



**Change sought to make legally compliant:**

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**Reference:** 765\1 S

**Respondent:** Sharon Bryant

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 766\1 S

**Respondent:** Peter Bryant

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

**Change sought to make legally compliant:**

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**Reference:** 767\1 S

**Respondent:** Gary Sweet

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 768\1 S

**Respondent:** Fiona Sweet

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 769\1 S

**Respondent:** Fiona Britten

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 770\1 S

**Respondent:** Lee Smith

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 771\1 S

**Respondent:** Vicki Ephgrave

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 772\1 S

**Respondent:** Paul Feltham

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 773\1 S

**Respondent:** Vicky Feltham

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 774\1 S

**Respondent:** Nancy Mathias

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 775\1 S

**Respondent:** Neal Mathias

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 776\1 S

**Respondent:** M D Shortman

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 777\1 S

**Respondent:** P D Shortman

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**Change sought to  
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**Representation (legal compliance):**

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**Reference:** 778\1 S

**Respondent:** Bernard Coombs

**Representation** I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

---

**Reference:** 779\1 S

**Respondent:** Beryl Coombs

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 780\1 S

**Respondent:** Jane Hewitt

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

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 781\1 S

**Respondent:** Martin Hewitt

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 782\1 S

**Respondent:** Margaret Barnes

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 783\1 S

**Respondent:** R Tippins

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 784\1 S

**Respondent:** Sherry Robins

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 785\1 S

**Respondent:** Rosemary Pond

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 786\1 S

**Respondent:** James Pond

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 787\1 S

**Respondent:** M J Parsons

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 788\1 S

**Respondent:** J A Parsons

**Representation** I am pleased to write endorsesing the Draft Core Strategy which now protects the Green Belt  
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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 789\1 S

**Respondent:** G Hall-Kenny

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 790\1 S

**Respondent:** Paul Moylett

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 791\1 S

**Respondent:** Mrs B Moylett

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

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**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 793\1 S

**Respondent:** Lorraine Davies

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 794\1 S

**Respondent:** Alison Davies

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 795\1 S

**Respondent:** Ruth Wear

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

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 796\1 S

**Respondent:** John Wear

**Representation** I am pleased to write endorsing the Draft Core Strategy which now protects the Green Belt  
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**Reference:** 797\1 S

**Respondent:** Sarah Sheenhan

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

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**Reference:** 798\1 S

**Respondent:** Kerry Sheenhan

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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 799\1 S

**Respondent:** L M Johnson

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

**Change sought to make legally compliant:**

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**Reference:** 800\1 S

**Respondent:** A L Johnson

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 801\1 S

**Respondent:** A Lindley

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

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**Change sought to  
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**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 802\1 S

**Respondent:** G Lindley

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 803\1 S

**Respondent:** Alan York

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 804\1 S

**Respondent:** D D Lugiewicz-York

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 805\1 S

**Respondent:** A Cooper

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

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**Change sought to  
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**Representation (legal compliance):**



**Change sought to make legally compliant:**

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**Reference:** 806\1 S

**Respondent:** S Cooper

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 807\1 S

**Respondent:** J Blackwell

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 808\1 S

**Respondent:** Susan Rosolek

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 809\1 S

**Respondent:** Enrico Rosolek

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 810\1 S

**Respondent:** Paul Britten

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 811\1 S

**Respondent:** Jill Britten

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 812\1 S

**Respondent:** S Penfold

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

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**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 813\1 S

**Respondent:** John Lane

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

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

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

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

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

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 814\1 S

**Respondent:** Angela Lane

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

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

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

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

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

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 815\1 S

**Respondent:** Cologero Santilippo

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

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

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

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

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 819\3

**Respondent:** Paulton Parish Council

**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:**

**Plan Reference:** Table 2: Key District-wide Infrastructure

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**Reference:** 298\3

**Respondent:** Liberal Democrat Group

**Representation** Reference to play areas should be considered a key infrastructure item to underpin the effectiveness of  
**(soundness):** development which promotes health and wellbeing.

**Change sought to make sound:** Insert a second line to read:

**make sound:** Key infrastructure item: "Minimum provisions relating to development"  
Timescale: "2012-2026"  
Cost: "not quantified"

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 318\6

**Respondent:** MOD

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

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

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

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference:** Diagram 4: Bath and North East Somerset - The Key Diagram

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**Reference:** 130\1

**Respondent:** South Stoke Parish Council

**Representation** It is unsound because it is not consistent with national Green Belt policy. Policy CP8 states "The general  
**(soundness):** extent of the Green Belt is set out on the Core Strategy Key Diagram".

The Core Strategy Key Diagram appears as Diagram 4 on page 21. This Diagram is incorrect and needs to be changed along with diagram 3 on page 12, diagram 14 on page 77, diagram 18 on page 95, and diagram 20 on page 119.

The village of South Stoke is situated entirely within the Green Belt and (with the minor exception of some post war housing on Midford Road) is entirely located within the AONB. The Key Diagram 4 is incorrect as it shows South Stoke to be a suburban part of Bath (which it is not) and does not show it over-washed by Green Belt and AONB, as it should, and as is consistent with the current Local Plan. We are sure this is nothing more than a mistake that needs rectification. The mistake is then perpetrated on Diagrams 3, 14, 18, and 20, which all show South Stoke as a part of suburban Bath when clearly it is not.

- Change sought to** 1. Change Diagram 4 (the Key Diagram) so as to show that South Stoke is not part of urban Bath, but is  
**make sound:** instead colour-washed over by Green Belt and AONB designations.
2. Change diagram 3 on page 12 so that South Stoke is not shown as part of suburban Bath. We suggest it is marked by a black dot on this diagram in the same way that Wellow and Corston are marked.
3. Continue this change through to diagrams 14, 18, and 20 all of which are incorrect.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 177\1

**Respondent:** Mr Derek Satow

**Representation** The Key Diagram shows South Stoke as an inset in both the Green Belt and AONB. In the current  
**(soundness):** B&NES Local Plan, South Stoke parish and village are washed over by the Green Belt (and have been since the Green Belt in this area was established in 1990 on adoption of the Wansdyke Environs of Bath Local Plan). South Stoke does not meet the criteria to be a Policy RA1 settlement and is not designated as such. Moreover to make it an inset would involve a major boundary change, contrary to the statement in para. 1.31.

With regard to the AONB, the whole of South Stoke parish is within the area designated as AONB by the 1990 variation order with the exception of a small area of housing on the Midford Road.

- Change sought to** On the Key Diagram (and other similar diagrams), South Stoke parish and village should be shown as  
**make sound:** washed over by both Green Belt and AONB. (the small area of housing on the Midford Road excluded from the AONB is probably too small to be significant at the scale of the Key Diagram, but the boundary of this small exclusion will no doubt be evident on the Proposals Map.)

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 227\7

**Respondent:** London Road Area Residents Association

**Representation** Both diagrams 4 & 5 show 'Flood Storage Facility' as pink/orange dots within the river and in areas  
**(soundness):** which are surely already in the flood plain of the river Avon.

In addition in Diagram 5 a small part of the railway is also included in the Area of search for location of Flood Storage facilities. This surely cannot be right and would lead to subsidence of the railway track.

- Change sought to** The dots should be removed from Diagrams 4 & 5 and a new map showing Areas of search for Flood  
**make sound:** Storage included in the Flooding section on pages 112 - 113

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 246\17

**Respondent:** Combe Hay Parish Council

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

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

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 248\8

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

**Representation** 1) In these representations, RPS makes clear that the prescribed strategic housing requirement of  
**(soundness):** 11,000 homes grossly under plays the level of need and demand for new housing within BANES in the period 2006-2026. The Council should be planning for 21,300 homes as set out in the RSS Modifications and reflect a more ambitious target for addressing economic growth in BANES and the wider sub-region and meeting housing need.

2) The table below sets out how the strategic requirement and distribution has changed over time. Regardless of the fact that BANES has sought to ignore the requirements of the development plan (RS), the strategy now presented bears no resemblance to spatial options presented in December 2009. BANES Regional Strategy Spatial Option 1 (Dec 09) Spatial Option 2 (Dec 09) Publication Core Strategy (Dec 10) Draft RS (Mar 06) Panel Report (Dec 07) RSS Modifications (July 08)

Bristol Urban Extension 3,650 3,300 0 6,000 6,000 8,000

Bath Urban Extension 2,000 2,000 0 1,500 1,500 2,000

Bath Urban Area 6,000 5,000 6,000 6,000 6,000 6,000

Rural Areas 1,500 1,900 800 2,000 2,300 2,300

Somer Valley 1,000 1,700 2,700

Keynsham 1,700 1,600 1,500 3,000 3,000

Total 15,500 15,500 11,000 15,500 18,800 21,300

3) Aside from the Bath urban area (which has remained remarkably consistent throughout), the spatial distribution bears no resemblance to those options presented in December 2009, let alone the RS Modifications. It is important to analyse how the 11,000 homes has been derived; the Council's recently published SHLAA has the answers.

4) The SHLAA and trajectories contained within its appendices show that BANES has an identifiable supply to achieve just over the 11,000 homes requirement. Seemingly that is the basis in which the 11,000 homes target has been set. The 'evidence' underpinning the 11,000 homes (ie Keith Woodhead Report) is a smokescreen to justify a position that fits supply. What other explanation is there for an authority that seems content to plan on the basis of a uniquely unambitious economic growth target and is content to fail to meet housing need and demand on any level?

5) It is not enough to simply provide a spatial distribution for growth based solely on the available supply. There is no value in having a Core Strategy if such parameters. Quite simply, there is no 'planning' involved in this strategy. If our reading of the SHLAA is correct then BANES has already achieved completions of 1,664 homes in the first four years of the plan period; it has commitments for a further 8,792 and has further sites identified in the SHLAA for 1,284, taking the total to 11,290 homes. Regardless of RPS' deep reservations over the delivery of much of the land with planning permission/subject to old LP allocations, it is clear that the strategy has been derived on the basis of supply. Conveniently, as a result of planning for 11,000 homes, BANES miraculously now has a five year supply of housing land.

6) It is little wonder the strategic requirement has been so grossly contrived. Paragraph 2.8 of the Terence O'Rourke study commissioned by the South West Regional Assembly in July 2008 to review local authorities performance against key indicators suggested that: "We have calculated that the Council has a shortfall of 148 dwellings per annum based on the RSS dwelling requirement. The shortfall increases to 306.8 dwellings per annum in relation to the Panel Report housing figures. This is the largest 5 year housing land shortage recorded for all authorities in the south west that either involve an SSCT or to accommodate an urban extension. The consultation on the Core Strategy launch document incorporated the RSS housing figure. According to the Council, background work is being

undertaken to examine options for responding to a higher dwelling requirement in the forthcoming consultation document which will be guided by the Panel's recommended figure".

7) Clearly the Council has reneged on the advice given to O'Rourke's that it would be focusing on higher rates of growth

8) By establishing capacities at the various locations throughout BANES, the Council has already acknowledged through the Spatial Options Paper that there is capacity for at least 16,850 homes (if the higher capacity scenarios from each of the two options are aggregated together). It makes no sense why BANES would want to restrict the level of growth to 11,000 homes if it readily acknowledges that this level of capacity already exists and there is scope to make a more meaningful contribution to the affordable housing needs of the sub-region. Moreover, RPS asserts that there is significant additional capacity within the South East Bristol urban extension that means that the RS specific requirement of that area can be met. Again, RPS reiterates the need to plan for a higher level of development and the 21,300 homes figure in the RSS Modifications.

9) The requirement for the SSCTs Bristol and Bath as set out in the RS should be sacrosanct. The "numbers" that are apportioned to each SSCT relate solely to the growth needs and requirements of those cities. It is not for BANES to now determine whether those levels of growth are appropriate and whether those levels of the strategic housing and job provision can be filtered off to less sustainable locations in the pursuit of other objectives.

10) RPS reserves its comments on Keynsham, Somer Valley, and the rural areas for the specific chapters that they relate to. In essence, RPS does not consider the strategy and option to be sound because it is inherently unsustainable and as a consequence ineffective. The RSS would not, with the possible exception of Keynsham, identify these settlements as Policy B towns. The Panel Report made clear that those settlements should only be subject to locally specific growth and therefore better fall under the definition of Policy C towns.

11) If the Council wishes to persist with the strategy "for the rural areas", it should not do so at the expense of development at the SSCTs. A simple solution would be to increase the overall strategic requirement. The Council would therefore be better placed to pursue its own initiatives, whilst also adhering to the RS spatial distribution to focus development at the SSCTs.

12) The strategy of dispersal contradicts the very principles of sustainable development. The dispersal strategy will not lead to developments of sufficient quantum that can genuinely deliver improvements to public transport infrastructure in the rural areas and there will be little opportunity but to continue to rely on the use of the private car. This is recognised in the SA. It is clear that jobs will continue to grow predominantly at the SSCTs and they will remain the draw for the largely affluent rural areas of the district. Any improvements that are made to infrastructure at the SSCTs could be offset by the increased level of commuter traffic coming in from the rural areas.

13) The principle behind creating more sustainable communities is to create more self contained settlements that rely less on commuting out to the SSCTs of Bath and Bristol and providing significant additional employment opportunities for the existing community. It is difficult to understand therefore why the Council seeks to significantly increase the level of residential growth in these locations when clearly any benefits derived from any economic growth will be offset by the increases in housing. The notion that additional housing growth will act as a stimulus bringing additional jobs to any given location is naïve. If a strategy for growth is to be pursued, then it is essential that any expansion at these locations is led by economic growth. It cannot be considered a sustainable strategy to allow any further housing at these locations until such time as there is at the very least an equivalent quantum of economic growth. In essence, the Council has already set itself up to plan to fail to meet this strategic requirement.

**Change sought to make sound:** 1) The key diagram goes to the heart of this CS. RPS considers it to be so fundamentally unsound that the only course of action is to abandon the plan and start again with a clear direction to deliver ambitious growth that meets the needs of BANES and contributes to wider sub-regional goals.  
2) Essentially, this means planning for a higher rate of growth; that is 21,300 homes as set out in the RSS Modifications but seeks to make provision for that in a flexible and transparent way. It also means creating the context for ambitious economic growth in line with the West of England LEP objectives. The LEP predicts GCA growth in the West of England of 3.4% (by 2020); this Core Strategy prefers to plan for 1.6%. Not only does this show a marked lack of ambition at odds with its own vision and objectives, but the examination of this CS must focus on the wider impact at a sub-regional level and



the associated negative social and economic consequences.

3) To rectify this requires the CS to recognise the need for sustainable urban extensions to the cities of Bristol and Bath.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\3

**Respondent:** The Bath Society

**Representation** Diagrams 4 & 5 show 'Flood Storage Facility' as pink/orange dots within the river and in other areas  
**(soundness):** already in the flood plain of the River Avon.

In Diagram 5 a small part of the railway is also included in the area of search for location of Flood Storage facilities. This could lead to subsidence of the railway track.

**Change sought to** The dots should be removed from Diagrams 4 & 5 to a new map showing areas of search for Flood

**make sound:** Storage included in the Flooding section on pages 112 - 113

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 276\2

**Respondent:** Hignett Family Trust

**Representation** The Key Diagram shows the scale and distribution of housing and jobs which needs amending to better  
**(soundness):** distribute the growth in a more sustainable manner and to address the proper scale of the growth, particularly in Bath. The information on the Key Diagram means it is unsound. The lack of information means that the key Diagram fails to properly fulfil the advice in PPS12 and the Local Plan 2004 Regulations.

An extract from PPS12, Annex A is below.

A1. Key diagram: this is a diagrammatic interpretation of the spatial strategy as set out in the core strategy. Authorities may wish to use a key diagram to enable them to illustrate the broad strategy for the area in a similar fashion to existing key diagrams in structure plans. It is most likely to be appropriate to an area of significant change where the general location of broad areas of future development can be identified together with linkages between such areas and the relationship to other strategies and neighbouring areas. Broad areas of protection/little anticipated change can also be shown.

The Key Diagram fails to show: any linkages between areas in the Plan, key transport initiatives and movements that will drive sustainable development, transport infrastructure ie railways/stations, linkage and relationship with neighbouring authorities, New Neighbourhoods. The JRSP 2002 provides a help guide to the sort of information that should be attached to the Key Diagram... including inset plans for broad strategic areas.

The Key Diagram should include amongst other information, the location of the New Neighbourhood at Odd Down and an extension of the District Heating Priority Area at Odd Down, as shown on the amended Key Diagram.

Details of the scale and distribution of growth will require amendment, to accord with the other representations including HLT1.

**Change sought to** The text which supports key Diagram 4 will need consequential changes and any changes to policy,

**make sound:** inset diagrams, new policy proposals should be taken into account in a new Key Diagram

**Representation (legal compliance):** The Key Diagram needs to show through inset plans, where more detailed strategic proposals and policies are defined? At present the CS has 21 diagrams, some of which set out spatial policies and proposals, in places some are defined as illustrative. It is therefore not clear what the status is of many of these diagrams and how they relate to the Key Diagram. TCP Local Plan Regulations 2004, together with PPS12, provides the details that should be followed in Key Diagram and other inset plans. This has not been followed.

The advice on the content of the Key Diagram  
The LDD does not contain a submission proposals map ( This is referred to in the LDS) but is not provided. Therefore the saved policies within the Local Plan continue to run in the Adopted Proposals Map despite the revisions to the Policies (Appendix 1) , the new policies in the CS and the proposed Saved Policies as set out in Appendix 2. ( Many of these saved policies will require deletion or amendment, see Repts on Appendix 2 , which together will impact on the Adopted Proposals Map).For example, the inset plans ie Diagram 7 and Policy B2 contain site specific proposals, which require changes to the Proposals Map. The strategic allocations in the CS, including those proposed to be added to the CS at a New Neighbourhood, will require amendment to the Key Diagram and the Proposals Map. Area based policies in the CS also need to be expressed in the Proposals Map, in accordance with the LDS. The lack of a draft Submissions Proposals Map makes the process almost impossible to understand the impact of these revised policies and is possibly non-compliant.

**Change sought to make legally compliant:** Some of the Key Diagram changes are shown below.

Note : no strategic links with neighbouring authorities either for economic transport , environmental reasons. This needs to be rectified . For details of revised jobs and homes distribution see Rep HFT1.