

**BATH AND NORTH EAST SOMERSET CORE STRATEGY EXAMINATION  
INSPECTOR'S NOTE ON THE CONSULTATION ON THE PROPOSED CHANGES TO THE  
SUBMITTED CORE STRATEGY**

I note that the consultation on proposed changes will extend to 8 May, a week later than originally anticipated. Should I therefore also assume that the schedule of new representations will not now be available until 7 June? Please also bear in mind that it will take several days for the boxes of information to reach me as they will need to be sent via the Programme Officer.

I note that the Council is proposing substantial changes to the Core Strategy involving new sites in the Green Belt and that there are a large number of new evidence studies. The changes are likely to generate a substantial number of new representations. Accordingly, substantial preparation will be required by me before I am in a position to programme the resumed hearings. I would not want to fix the date for any such hearings until I have got to grips with the scale and range of issues raised. It seems likely that the resumed hearings will take at least 2 weeks. If I do not start detailed preparation before nearly mid June, the hearings will not be before the school summer holidays. I will want to consider as part of my initial preparation whether it would be more effective to hold the hearings relating to the overall scale of housing required and other broad strategic issues in advance of the hearings on the proposed Green Belt locations, so that I can draw some preliminary conclusions on the overall strategic issues before the location specific hearings. Such an approach may help the later hearings be more focussed and manageable.

Because it is possible that separate hearings may be needed on each of the proposed Green Belt locations, it is essential that representors/ representations and which ones want to be heard relating to those individual locations can be identified at the outset in order to consider the structure for a draft hearing programme. Particular attention will therefore need to be paid to the recording and classification of representations on the Green Belt changes. The Council's schedule summarising the representations should group together comments separately on each of the different Green Belt locations.

In addition to the above, I would highlight the following matters as essential for my effective initial preparation:

1. Given the substantial range of new evidence studies, I want the Council to make clear to me which previous documents the new studies replace or, if not replaced, how the new studies are intended to be read with the previous material on the same topic.
2. I note that there is an updated SHLAA. Please would the Council explain:
  - what sites have been added or removed from the new SHLAA compared with the SHLAA considered at the previous hearings (CD4/H13 and H14) and why;

- the reasons for any significant changes to capacity or the delivery trajectory of individual sites.

I do not want to have to do a line-by-line comparison of the new SHLAA with the previous one(s).

3. In my preliminary conclusions, I commented on a number of significant constraints such as the Windsor Road gas holder and the Bath upstream flood compensation scheme. Please explain what is the current position with these constraints. Any new evidence on which the Council rely must, of course, be in the public domain and included as background to the current consultation.

4, If not explained elsewhere, how the Council's proposed changes to the Green Belt have taken into account the 3rd sentence of NPPF paragraph 83 - boundaries capable of enduring beyond the plan period.

5. A draft schedule of potential Main Modifications bringing together the composite text of all the various extant changes necessary for soundness and the composite text and diagrams of the whole Core Strategy, as explained in the attached note.

All the above information should be put in the public domain. Much would be of relevance and assistance to those wishing to make further representations during the forthcoming consultation. The information should be published as soon as possible with an indication at the outset of the consultation period when it will be available.

**Simon Emerson**  
**INSPECTOR**

**22 March 2013**