

# **Schedule of Comments on the Amendments to the Core Strategy, November 2013**



# Schedule of Comments on the Amendments to the Core Strategy, November 2013

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**Table 1: Order of Comments**

Comments on the [Proposed Changes to the Submitted Core Strategy](#) are sorted according to the relevant Change Reference. (Deleted text is struckthrough, new text is bold)

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19	CSA19	Policy B3 – Twerton & Bath Riversides, bath
20	CSA20	Development on the edge of Bath
21	CSA21	Amendments to GB Boundary, Bath
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23	CSA23	Land adjoining Odd Down
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28	CSA28	Land adjoining Weston (General)
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Order	Change Reference	
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39	CSA39	Preamble on rural areas
40	CSA40	
41	CSA41	POLICY RA1
42	CSA42	
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44	CSA44	Land adjoining Whitchurch
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46	CSA46	
47	CSA47	Table to Policy CP2
48	CSA48	
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53	CSA53	Paras on Plan review
54	CSA54	
55	BT1	Odd Down - Alternative Option 1
56	BT2	Odd Down - Alternative Option 2
57	KM1	Alternative Site Options - East Keynsham (north of railway)
58	KM2	Alternative Site Options - SW Keynsham (south of railway)
59	KM3	Alternative Site Options - SW Keynsham (including Leys Farm)
60	WH1	Alternative Site Options - Whitchurch (Horseworld)
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# **Schedule of Comments**



# Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

### Change Reference: CSA1

**Respondent Number:** 170 **Comment Number:** 1 **Respondent Name:** Robert Hitchins Ltd

**Respondent Organisation:**

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA1

**Location:**

#### Comment made on the Proposed Change:

Support:

We have previously made representations to request that strategic sites are allocated in the Core Strategy in order to be consistent with the NPPF para 47 which states that the Local Plan should identify key sites which are critical to the delivery of the housing strategy over the plan period.

The Inspector expressed concern in his note ID/40 that identifying only broad locations in the Core Strategy and leaving the allocation of specific sites to the Placemaking Plan would mean that new housing would not be delivered quickly enough.

It is evident in BANES that if the Council is to maintain at least a 5 year housing land supply, then sites within the Green Belt need to be identified in the Core Strategy. The Inspector in ID/40 para 17 stated that, "Making at least some of the strategic broad locations specific allocations in the core strategy would enable the plan to contribute directly to the 5 year supply at adoption."

However, the proposed amendments to the spatial strategy provide an insufficient response and an inadequate review of the Green Belt, in view of the potential scale of future housing needs in B&NES and Bristol. An objection is made to Policy RA5 strategic site allocation – see reps on CSA 44 and 45

**Change to the policy requested:**

**Respondent Number:** 216 **Comment Number:** 2 **Respondent Name:** Mr & Mrs Hawkes

**Respondent Organisation:** Crest Homes (SW)

**Agent ID:** 174 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA1

**Location:**

#### Comment made on the Proposed Change:

Support:

The Inspector expressed concern in his note ID/40 that identifying only broad locations in the Core Strategy and leaving the allocation of specific sites to the Placemaking Plan would mean that new housing would not be delivered quickly enough.

Proposed amendments to the spatial strategy provide an insufficient response and are an inadequate review of the Green Belt, in view of the potential scale of future housing needs in B&NES and Bristol. Only five sites, for 150 to 300 dwellings each, are proposed to be allocated. Otherwise the general extent of the Green Belt is to be retained.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

CSA 10 states that ‘The detailed inner and outer boundaries of the Green Belt will also be reviewed in the Placemaking Plan in order to address any anomalies or make other necessary adjustments.’ It is not clear what is meant by ‘anomalies or other necessary adjustments.’ The approach does not appear to envisage that the Placemaking Plan will release from the Green Belt significant housing sites (for 10 to 150 dwellings) that could make a significant contribution to serving local housing needs and the overall housing needs of the District.

There is a clear need for further revisions of the Green Belt to be incorporated in the Core Strategy including the release of additional sites on the edges of Bristol at Hicks Gate and on the edges of significant settlements, such as Keynsham, Saltford and the Somer Valley settlements, in particular. Such opportunities cannot be addressed in the Placemaking Plan within the constraint of retaining the general extent of the Green Belt. There is also a need to consider potential non-Green Belt sites for housing development on the edges of settlements, especially in the Somer Valley.

Source: Bristol City Council, Five Year Housing Land Supply 2013 – 2018 [See original representation]

In ID/40, the Inspector suggested that an allowance could be made for non-strategic Green Belt sites on the basis of site assessments in the SHLAA. It is not at all clear how this would work, as sites identified as suitable in all other respects in the SHLAA have been eliminated from further consideration if they are in the Green Belt and it is not clear how they could be considered in the Placemaking Plan as ‘anomalies or other necessary adjustments’ if the general extent of the Green Belt is to be retained.

If sites for fewer than 150 dwellings are not identified in the Core Strategy for release from the Green Belt, there is a need for a policy statement that Green Belt boundaries can be reviewed in the Placemaking Plan for sites of up to 150 dwellings in certain locations including, for example, land south of Manor Road Saltford.

There is a particular need to remove land from the Green Belt at Hicks Gate, as this area complements the contingency for an urban extension that is identified by the Bristol Core Strategy (in Policy BCS5 and the Key Diagram). It is clear that Bristol’s supply of housing land is constrained by the limited supply of sites within the City’s tight boundaries. These constraints are demonstrated by the City’s downward housing supply trajectory, which is reproduced in the graph below and shows that the City is unable to ‘boost significantly the supply of housing as required by the NPPF’ within the constraints of the City’s boundaries and the policies of its Core Strategy. There is therefore no doubt that Bristol will need to consider the use of Green Belt land in southeast Bristol to accommodate the higher levels of housing provision that will be found necessary when a Strategic Housing Market Assessment for the West of England authorities is undertaken in 2015. Land in B&NES should be made available now to support that necessary extension of the Bristol urban area. If it is not allocated for release from the Green Belt in the Core Strategy, it should at least be ‘safeguarded’ for future release in conjunction with a review of the Bristol Core Strategy (by a partial review of the B&NES Core Strategy).

**Change to the policy requested:**

A more comprehensive review of the Green Belt is required on the basis of a robust assessment of future housing requirements, based on a long-term view of trends in migration, household formation and economic activity and on a full consideration of the impacts of housing demand in adjoining districts – in particular Bristol.

The review should include the strategic location of Hicks Gate because of its close relationship with Bristol and allocate or otherwise identify opportunities for a portfolio of smaller sites to be released from the Green Belt at other significant settlements such as Keynsham, Saltford and the Somer Valley towns.

**Respondent Number:** 219 **Comment Number:** 2 **Respondent Name:** Edward Ware Homes Limited **Respondent Organisation:**

**Agent ID:** 165 **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA1

**Location:**

**Comment made on the Proposed Change:**

Support:

The Inspector expressed concern in his note ID/40 that identifying only broad locations in the Core Strategy and leaving the allocation of specific sites to the Placemaking Plan would mean that new housing would not be delivered quickly

enough.

Proposed amendments to the spatial strategy provide an insufficient response and are an inadequate review of the Green Belt, in view of the potential scale of future housing needs in B&NES and Bristol. Only five sites, for 150 to 300 dwellings each, are proposed to be allocated. Otherwise the general extent of the Green Belt is to be retained.

CSA 10 states that ‘The detailed inner and outer boundaries of the Green Belt will also be reviewed in the Placemaking Plan in order to address any anomalies or make other necessary adjustments.’ It is not clear what is meant by ‘anomalies or other necessary adjustments.’ The approach does not appear to envisage that the Placemaking Plan will release from the Green Belt significant housing sites (for 10 to 150 dwellings) that could make a significant contribution to serving local housing needs and the overall housing needs of the District.

There is a clear need for further revisions of the Green Belt to be incorporated in the Core Strategy including the release of additional sites on the edges of Bristol at Hicks Gate and on the edges of significant settlements, such as Keynsham, Saltford and the Somer Valley settlements, in particular. Such opportunities cannot be addressed in the Placemaking Plan within the constraint of retaining the general extent of the Green Belt. There is also a need to consider potential non-Green Belt sites for housing development on the edges of settlements, especially in the Somer Valley.

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In ID/40, the Inspector suggested that an allowance could be made for non-strategic Green Belt sites on the basis of site assessments in the SHLAA. It is not at all clear how this would work, as sites identified as suitable in all other respects in the SHLAA have been eliminated from further consideration if they are in the Green Belt and it is not clear how they could be considered in the Placemaking Plan as ‘anomalies or other necessary adjustments’ if the general extent of the Green Belt is to be retained.

If sites for fewer than 150 dwellings are not identified in the Core Strategy for release from the Green Belt, there is a need for a policy statement that Green Belt boundaries can be reviewed in the Placemaking Plan for sites of up to 150 dwellings in certain locations.

**Change to the policy requested:**

A more comprehensive review of the Green Belt is required on the basis of a robust assessment of future housing requirements, based on a long-term view of trends in migration, household formation and economic activity and on a full consideration of the impacts of housing demand in adjoining districts – in particular Bristol.

The review should include the strategic location of Hicks Gate because of its close relationship with Bristol and allocate or otherwise identify opportunities for a portfolio of smaller sites to be released from the Green Belt at other significant settlements such as Keynsham, Saltford and the Somer Valley towns.

**Respondent Number:** 269  
**Comment Number:** 2  
**Respondent Name:**  
**Agent ID:** 174 **Agent Name:** Pegasus Planning Group

**Respondent Organisation:** Barratt Homes Ltd

**Further Information available in the original comment?**  **Attachments sent with the comment?**

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

**Change Reference:** CSA1

**Location:**

**Comment made on the Proposed Change:**

Support:

The Inspector expressed concern in his note ID/40 that identifying only broad locations in the Core Strategy and leaving the allocation of specific sites to the Placemaking Plan would mean that new housing would not be delivered quickly enough.

Proposed amendments to the spatial strategy provide an insufficient response and are an inadequate review of the Green Belt, in view of the potential scale of future housing needs in B&NES and Bristol. Only five sites, for 150 to 300 dwellings each, are proposed to be allocated. Otherwise the general extent of the Green Belt is to be retained.

CSA 10 states that 'The detailed inner and outer boundaries of the Green Belt will also be reviewed in the Placemaking Plan in order to address any anomalies or make other necessary adjustments.' It is not clear what is meant by 'anomalies or other necessary adjustments.' The approach does not appear to envisage that the Placemaking Plan will release from the Green Belt significant housing sites (for 10 to 150 dwellings) that could make a significant contribution to serving local housing needs and the overall housing needs of the District.

There is a clear need for further revisions of the Green Belt to be incorporated in the Core Strategy including the release of additional sites on the edges of Bristol at Hicks Gate and on the edges of significant settlements, such as Keynsham, Saltford and the Somer Valley settlements, in particular. Such opportunities cannot be addressed in the Placemaking Plan within the constraint of retaining the general extent of the Green Belt. There is also a need to consider potential non-Green Belt sites for housing development on the edges of settlements, especially in the Somer Valley.

There is a particular need to remove land from the Green Belt at Hicks Gate, as this area complements the contingency for an urban extension that is identified by the Bristol Core Strategy (in Policy BCS5 and the Key Diagram). It is clear that Bristol's supply of housing land is constrained by the limited supply of sites within the City's tight boundaries. These constraints are demonstrated by the City's downward housing supply trajectory, which is reproduced in the graph below and shows that the City is unable to 'boost significantly the supply of housing as required by the NPPF' within the constraints of the City's boundaries and the policies of its Core Strategy.

There is therefore no doubt that Bristol will need to consider the use of Green Belt land in southeast Bristol to accommodate the higher levels of housing provision that will be found necessary when a Strategic Housing Market Assessment for the West of England authorities is undertaken in 2015. Land in B&NES should be made available now to support that necessary extension of the Bristol urban area. If it is not allocated for release from the Green Belt in the Core Strategy, it should at least be 'safeguarded' for future release in conjunction with a review of the Bristol Core Strategy (by a partial review of the B&NES Core Strategy).

In ID/40, the Inspector suggested that an allowance could be made for non-strategic Green Belt sites on the basis of site assessments in the SHLAA. It is not at all clear how this would work, as sites identified as suitable in all other respects in the SHLAA have been eliminated from further consideration if they are in the Green Belt and it is not clear how they could be considered in the Placemaking Plan as 'anomalies or other necessary adjustments' if the general extent of the Green Belt is to be retained.

If sites for fewer than 150 dwellings are not identified in the Core Strategy for release from the Green Belt, there is a need for a policy statement that Green Belt boundaries can be reviewed in the Placemaking Plan for sites of up to 150 dwellings in certain locations including, for example, land south of Manor Road Saltford.

**Change to the policy requested:**

A more comprehensive review of the Green Belt is required on the basis of a robust assessment of future housing requirements, based on a long-term view of trends in migration, household formation and economic activity and on a full consideration of the impacts of housing demand in adjoining districts – in particular Bristol. The review should include the strategic location of Hicks Gate because of its close relationship with Bristol and allocate or otherwise identify opportunities for a portfolio of smaller sites to be released from the Green Belt at other significant settlements such as Keynsham, Saltford and the Somer Valley towns.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

**Respondent Number:** 275    **Comment Number:** 1    **Respondent Name:** Redrow Homes South West    **Respondent Organisation:**

**Agent ID:** 164    **Agent Name:** DLP Planning Consultants

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA1

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**

**Support:**

We agree that where land is to be released from the Green Belt that this should be identified in the Core Strategy.

The approach taken hitherto by the Council would not have delivered sufficient housing quickly enough.

**Change to the policy requested:**

**Respondent Number:** 275    **Comment Number:** 2    **Respondent Name:** Redrow Homes South West    **Respondent Organisation:**

**Agent ID:** 164    **Agent Name:** DLP Planning Consultants

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA1

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**

**Support:**

Paragraph 1.16 now states that where land is to be released from the Green Belt, the indication is that only strategic sites will be allocated. No reference is made to 'Safeguarding Land' which should also be identified in the Core Strategy and not the Peacemaking Plan.

**Change to the policy requested:**

Where land is to be released from the Green Belt, it is either allocated or safeguarded for development

**Respondent Number:** 837    **Comment Number:** 21    **Respondent Name:** David Redgewell    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA1

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Green Belts and World Heritage site are not reason no houses. People provide job and Health Care and to develop Disney World.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 2564 **Comment** 4 **Respondent**  
**Number:** **Number:** **Name:****Respondent** Strategic Land  
**Organisation:** Partnerships**Agent ID:** 128 **Agent Name:** Peter Brett Associates**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA1**Location:** Comment on multiple Strategic Sites**Comment made on the Proposed Change:**Support: 

The Changing Role of the Core Strategy

2. There are a number of fundamental problems with the plan as it stands, one of which arises as a direct result of the Inspector's decision to continue on the basis that the geographical extent of the SHMA for BANES district is a suitable proxy for the real Housing Market Area. The reason given for this decision is that the 'Bath HMA within BANES district covers about 80% of the population of the district, it is a reasonable fit to regard the district as a single HMA for the purposes of producing a SHMA and that this approach is NPPF compliant'. The consequence of this decision must be that the provision the Council is making in its plan is as a response to the need identified by the SHMA, and is therefore housing provision for the part of the greater functional area that is covered by the HMA examined in the SHMA. All of the requirement identified should be met in the area where it arises, if at all possible as the Framework advises, and in this case that is possible. The development requirement should be met in locations that directly meet the needs of the residents of BANES, which effectively means that more development should be distributed to Bath, Keynsham and the Somer Valley because this is the area where the need that the Council has assessed is arising.

3. There should not be any significant development on the edge of Bristol to meet the requirement arising from the examination of the Bath HMA as the Council has undertaken. The development proposed in the current plan should be directed instead to Bath, Keynsham and the Somer Valley. There is a need for development on the edge of Bristol, but this requirement arises from a separate assessment of the requirement arising from the city of Bristol that cannot be met within the administrative area of Bristol. It is entirely evident that this need exists and that ignoring it means that the BANES Core Strategy cannot comply with Framework (notwithstanding the legal view reached over the application of the legal duty to cooperate). Any provision to meet that need would be over and above the provision already made in the plan and which would be made if the assessment even on the current basis was properly done.

4. We are also concerned that there is no recognition within the amendments of the relationship between BANES and Mendip and Wiltshire in relation to some of the smaller towns, particularly in relation to Midsomer Norton. This settlement is now effectively built up to BANES' southern boundary and expansion in this direction is reliant on delivery within Mendip. The SHLAA recognises that the areas needs to be planned together, and states that 'A comprehensive approach to planning and design for the whole area would be essential'. The lack of explicit recognition within the plan and the amendments of the need to cooperate with neighbouring authorities to deliver well planned future growth of Midsomer Norton in particular, is a significant gap and one which further demonstrates that cross boundary issues the Framework requires to be considered have not been properly addressed and have not influenced the plan as they should.

**Change to the policy requested:****Respondent** 2564 **Comment** 11 **Respondent**  
**Number:** **Number:** **Name:****Respondent** Waddeton Park Limited  
**Organisation:****Agent ID:** 128 **Agent Name:** Peter Brett Associates**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA1**Location:** Comment on multiple Strategic Sites

Comment made on the Proposed Change:

Support:

The Changing Role of the Core Strategy

2. There are a number of fundamental problems with the plan as it stands, one of which arises as a direct result of the Inspector's decision to continue on the basis that the geographical extent of the SHMA for BANES district is a suitable proxy for the real Housing Market Area. The reason given for this decision is that the 'Bath HMA within BANES district covers about 80% of the population of the district, it is a reasonable fit to regard the district as a single HMA for the purposes of producing a SHMA and that this approach is NPPF compliant'. The consequence of this decision must be that the provision the Council is making in its plan is as a response to the need identified by the SHMA, and is therefore housing provision for the part of the greater functional area that is covered by the HMA examined in the SHMA. All of the requirement identified should be met in the area where it arises, if at all possible as the Framework advises, and in this case that is possible. The development requirement should be met in locations that directly meet the needs of the residents of BANES, which effectively means that more development should be distributed to Bath, Keynsham and the Somer Valley because this is the area where the need that the Council has assessed is arising.

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Change to the policy requested:

**Respondent Number:** 3094 **Comment Number:** 1 **Respondent Name:**

**Respondent Organisation:** Purnell Property Partnership

**Agent ID:** 137 **Agent Name:** Savills

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA1

**Location:** Comment on Alternative Options

Comment made on the Proposed Change:

Support:

The Core Strategy should properly take into account non-green belt options prior to releasing land from the Green Belt.

Land at the former Paulton Print Works has outline planning permission for a Continuing Care Retirement Community. This is the central section of land showed in light pink on the attached plan MP.01 (revision G) (directly south of Ox Leaze).

Despite an active national marketing campaign since the outline consent was granted in 2010, the CCRC has failed to gather any market interest from operators. This is, in part, due to structural changes in the care market (such significant care operations are now seen to be less viable). The outline planning permission was granted during the national economic downturn and as a result the care market is now significantly different.

Whilst marketing of the site for care purposes will continue into 2015, it is now looking likely that an alternative use will need to be found for the site. Given the pressing need for housing both nationally and within B&NES, and the sustainable nature of the site in close proximity to Paulton's facilities and services, residential development should be considered as a potential use for the site. Clearly this non-green belt land, which is already identified for development, should be considered before land in the Green Belt is released. We consider the site could accommodate up to 100 dwellings.

Change to the policy requested:

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4788 **Comment Number:** 2 **Respondent Name:** Stratland LLP**Respondent Organisation:****Agent ID:** 182 **Agent Name:** Stratland LLP**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA1**Location:****Comment made on the Proposed Change:**Support: 

The Inspector expressed concern in his note ID/40 that identifying only broad locations in the Core Strategy and leaving the allocation of specific sites to the Placemaking Plan would mean that new housing would not be delivered quickly enough.

Proposed amendments to the spatial strategy provide an insufficient response and are an inadequate review of the Green Belt, in view of the potential scale of future housing needs in B&NES and Bristol. Only five sites, for 150 to 300 dwellings each, are proposed to be allocated. Otherwise the general extent of the Green Belt is to be retained.

CSA 10 states that 'The detailed inner and outer boundaries of the Green Belt will also be reviewed in the Placemaking Plan in order to address any anomalies or make other necessary adjustments.' It is not clear what is meant by 'anomalies or other necessary adjustments.' The approach does not appear to envisage that the Placemaking Plan will release from the Green Belt significant housing sites (for 10 to 150 dwellings) that could make a significant contribution to serving local housing needs and the overall housing needs of the District.

There is a clear need for further revisions of the Green Belt to be incorporated in the Core Strategy including the release of additional sites on the edges of Bristol at Hicks Gate and on the edges of significant settlements, such as Keynsham, Saltford and the Somer Valley settlements, in particular. Such opportunities cannot be addressed in the Placemaking Plan within the constraint of retaining the general extent of the Green Belt. There is also a need to consider potential non-Green Belt sites for housing development on the edges of settlements, especially in the Somer Valley.

In ID/40, the Inspector suggested that an allowance could be made for non-strategic Green Belt sites on the basis of site assessments in the SHLAA. It is not at all clear how this would work, as sites identified as suitable in all other respects in the SHLAA have been eliminated from further consideration if they are in the Green Belt and it is not clear how they could be considered in the Placemaking Plan as 'anomalies or other necessary adjustments' if the general extent of the Green Belt is to be retained.

If sites for fewer than 150 dwellings are not identified in the Core Strategy for release from the Green Belt, there is a need for a policy statement that Green Belt boundaries can be reviewed in the Placemaking Plan for sites of up to 150 dwellings in certain locations including, for example, land south of Manor Road Saltford.

There is a particular need to remove land from the Green Belt at Hicks Gate, as this area complements the contingency for an urban extension that is identified by the Bristol Core Strategy (in Policy BCS5 and the Key Diagram). It is clear that Bristol's supply of housing land is constrained by the limited supply of sites within the City's tight boundaries. These constraints are demonstrated by the City's downward housing supply trajectory, which is reproduced in the graph below and shows that the City is unable to 'boost significantly the supply of housing as required by the NPPF' within the constraints of the City's boundaries and the policies of its Core Strategy.

There is therefore no doubt that Bristol will need to consider the use of Green Belt land in southeast Bristol to accommodate the higher levels of housing provision that will be found necessary when a Strategic Housing Market Assessment for the West of England authorities is undertaken in 2015. Land in B&NES should be made available now to support that necessary extension of the Bristol urban area. If it is not allocated for release from the Green Belt in the Core Strategy, it should at least be 'safeguarded' for future release in conjunction with a review of the Bristol Core Strategy (by a partial review of the B&NES Core Strategy).

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

A more comprehensive review of the Green Belt is required on the basis of a robust assessment of future housing requirements, based on a long-term view of trends in migration, household formation and economic activity and on a full consideration of the impacts of housing demand in adjoining districts – in particular Bristol.

The review should include the strategic location of Hicks Gate because of its close relationship with Bristol and allocate or otherwise identify opportunities for a portfolio of smaller sites to be released from the Green Belt at other significant settlements such as Keynsham, Saltford and the Somer Valley towns.

**Respondent Number:** 4803 **Comment Number:** 1 **Respondent Name:** Simon Steel-Perkins

**Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA1

**Location:**

**Comment made on the Proposed Change:**Support: 

The Changing Role of the Core Strategy

2. There are a number of fundamental problems with the plan as it stands, one of which arises as a direct result of the Inspector's decision to continue on the basis that the geographical extent of the SHMA for BANES district is a suitable proxy for the real Housing Market Area. The reason given for this decision is that the 'Bath HMA within BANES district covers about 80% of the population of the district, it is a reasonable fit to regard the district as a single HMA for the purposes of producing a SHMA and that this approach is NPPF compliant'. The consequence of this decision must be that the provision the Council is making in its plan is as a response to the need identified by the SHMA, and is therefore housing provision for the part of the greater functional area that is covered by the HMA examined in the SHMA. All of the requirement identified should be met in the area where it arises, if at all possible as the Framework advises, and in this case that is possible. The development requirement should be met in locations that directly meet the needs of the residents of BANES, which effectively means that more development should be distributed to Bath, Keynsham and the Somer Valley because this is the area where the need that the Council has assessed is arising.

3. There should not be any significant development on the edge of Bristol to meet the requirement arising from the examination of the Bath HMA as the Council has undertaken. The development proposed in the current plan should be directed instead to Bath, Keynsham and the Somer Valley. There is a need for development on the edge of Bristol, but this requirement arises from a separate assessment of the requirement arising from the city of Bristol that cannot be met within the administrative area of Bristol. It is entirely evident that this need exists and that ignoring it means that the BANES Core Strategy cannot comply with Framework (notwithstanding the legal view reached over the application of the legal duty to cooperate). Any provision to meet that need would be over and above the provision already made in the plan and which would be made if the assessment even on the current basis was properly done.

**Change to the policy requested:**

**Respondent Number:** 5067 **Comment Number:** 1 **Respondent Name:** Mr Phil Harding

**Respondent Organisation:** Saltford Environment Group

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA1

**Location:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

Saltford Environment Group (SEG) welcomes the protection of the Green Belt surrounding our village in the Core Strategy Green Belt Amendments November/December 2013 consultation as our Green Belt serves several key purposes of the Green Belt as identified in the National Planning Policy Framework (NPPF). However we are concerned to see that Green Belt land at 5 locations in the B&NES area has been identified and proposed for development. This additional development is not proposed in response to the need for sustainable development but due to the requirement placed by central Government on B&NES Council to provide additional housing provision to address the Inspector's concerns around housing delivery. SEG therefore asks B&NES Council to apply the principle of sustainable development that underpins the NPPF and to resist the imposition by central Government of additional housing numbers in the B&NES Core Strategy that would require Green Belt development. This should be until central Government can prove to the satisfaction of B&NES residents at the local community level that development of any individual Green Belt site over and above brownfield sites would represent genuine sustainable development thereby benefiting the local and wider community.

**Change to the policy requested:**

As stated in response to section 7 above, SEG asks B&NES Council to apply the principle of sustainable development that underpins the NPPF and to resist the imposition by central Government of additional housing numbers in the B&NES Core Strategy that would require Green Belt development. This should be until central Government can prove to the satisfaction of B&NES residents at the local community level that development of any individual Green Belt site over and above brownfield sites would represent genuine sustainable development thereby benefiting the local and wider community.

**Respondent Number:** 5102 **Comment Number:** 1 **Respondent Name:** M Jenkins

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA1

**Location:**

**Comment made on the Proposed Change:**Support: 

Appalling that BANES is planning to build on green belt. Those fields house owls, deer and the most amazing wildlife, which BANES obvious sully don't care about, appalling and very disappointing for a council which relies very much on its beautiful surroundings for revenue.

**Change to the policy requested:****Change Reference: CSA2**

**Respondent Number:** 248 **Comment Number:** 2 **Respondent Name:**

**Respondent Organisation:** Crest Strategic Projects

**Agent ID:** 30 **Agent Name:** RPS Planning & Development

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA2

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**Support: 

1) RPS objects to the wording that claims the Core Strategy has 'been guided by the NPPF'. The NPPF is not guidance, it is a statutory responsibility to ensure that the CS complies with it in its entirety to enable it to be found sound. Is this a tacit acceptance that the Core Strategy is not fully in compliance with the NPPF? If it is then the CS cannot proceed.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

The plan is unsound as a consequence of many factors, not least this wording. A simple change cannot be made to rectify this.

**Respondent Number:** 2564 **Comment Number:** 12 **Respondent Name:**

**Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA2

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**Support: 

4. The plan is now seeking to identify allocations, effectively bringing forward the work that was to be done in the Placemaking Plan. These amendments mean that the Core Strategy has fundamentally changed its role and is now identifying strategic site allocations. The amendments purport to only relate to their green belt boundaries and the place-making principles; however while we support the principle of green belt release and allocation, we are very concerned that all relevant alternatives have not been properly and comprehensively assessed. It is essential that the Core Strategy, in promoting strategic sites, has considered all the implications of the alternative options to meet the objectively assessed need. This means understanding all the sites that could be used and delivered to provide for housing and other development needs as well as necessary infrastructure such as schools in sustainable locations. We are very concerned that a transparent and rigorous process has not been used to inform the allocations. As a consequence we are not convinced that that the policy framework for the district 'has been guided by the NPPF' (amendment CSA2), particularly in relation to the 'justified' test of soundness, because it is not clear that it is 'the most appropriate strategy when considered against reasonable alternatives'.

**Change to the policy requested:**

**Respondent Number:** 2564 **Comment Number:** 5 **Respondent Name:**

**Respondent Organisation:** Strategic Land Partnerships

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA2

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**Support: 

5. The plan is now seeking to identify allocations, effectively bringing forward the work that was to be done in the Placemaking Plan. These amendments mean that the Core Strategy has fundamentally changed its role and is now identifying strategic site allocations. The amendments purport to only relate to their green belt boundaries and the place-making principles; however while we support the principle of green belt release and allocation, we are very concerned that all relevant alternatives have not been properly and comprehensively assessed. It is essential that the Core Strategy, in promoting strategic sites, has considered all the implications of the alternative options to meet the objectively assessed need. This means understanding all the sites that could be used and delivered to provide for housing and other development needs as well as necessary infrastructure such as schools in sustainable locations. We are very concerned that such a transparent and rigorous process has not been used to inform the allocations. As a consequence we are not convinced that that the policy framework for the district 'has been guided by the NPPF' (amendment CSA2), particularly in relation to the 'justified' test of soundness because it is not clear that it is 'the most appropriate strategy when considered against reasonable alternatives'.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:****Respondent Number:** 4803 **Comment Number:** 2 **Respondent Name:** Simon Steel-Perkins **Respondent Organisation:** Waddeton Park Limited**Agent ID:** 128 **Agent Name:** Peter Brett Associates**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA2**Location:****Comment made on the Proposed Change:**Support: 

4. The plan is now seeking to identify allocations, effectively bringing forward the work that was to be done in the Placemaking Plan. These amendments mean that the Core Strategy has fundamentally changed its role and is now identifying strategic site allocations. The amendments purport to only relate to their green belt boundaries and the place-making principles; however while we support the principle of green belt release and allocation, we are very concerned that all relevant alternatives have not been properly and comprehensively assessed. It is essential that the Core Strategy, in promoting strategic sites, has considered all the implications of the alternative options to meet the objectively assessed need. This means understanding all the sites that could be used and delivered to provide for housing and other development needs as well as necessary infrastructure such as schools in sustainable locations. We are very concerned that a transparent and rigorous process has not been used to inform the allocations. As a consequence we are not convinced that that the policy framework for the district 'has been guided by the NPPF' (amendment CSA2), particularly in relation to the 'justified' test of soundness, because it is not clear that it is 'the most appropriate strategy when considered against reasonable alternatives'.

**Change to the policy requested:****Change Reference: CSA3****Respondent Number:** 170 **Comment Number:** 2 **Respondent Name:** Robert Hitchins Ltd **Respondent Organisation:****Agent ID:** 19 **Agent Name:** Pegasus Planning Group**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA3**Location:****Comment made on the Proposed Change:**Support: 

The Council has not 'undertaken an assessment of the needs of development within the District during the plan period' as described in CSA3 (paragraph 1.19a) to comply with paragraph 47 of the NPPF. An objection is therefore made to the Council's assessment of needs within the district during the plan period, which is reported as assessing the space needed for economic growth, housing, retail provision and social needs whilst also taking into account the Council's objective of promoting 'a higher value economy rather than only volume growth.'

The geography of the SHMA was discussed at the Hearing Session on 17th September and while the plan has proceeded, there are still significant issues regarding the reliance which can be placed on the SHMA, as amended by Addenda 1a to 1c, and these have been addressed in the Hearing Statement submitted for the Examination Hearing Session on 10th and 11th December 2013.

Even if it is accepted that a SHMA can be prepared for just the District, it is still necessary to consider the implications of

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

housing needs of neighbouring areas and especially Bristol, which have not been fully considered (contrary to the assertion in paragraph 1.18).

**Change to the policy requested:**

A more robust assessment is required of future housing requirements, recognising the underlying demographic, social and economic forces for change, based on a long-term view of trends in migration, household formation and economic activity and taking account of the impacts of housing demand in adjoining districts – in particular Bristol.

**Respondent Number:** 184 **Comment Number:** 1 **Respondent Name:** Paul Davis

**Respondent Organisation:** Persimmon Homes Severn Valley

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA3

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Persimmon Homes Severn Valley consider the amendments are not clear enough on the role the SHMA has in assessing the housing needs in accordance with NPPF guidance, paragraph 47.

**Change to the policy requested:**

1.PHSV consider the following amendment is required to the fourth sentence of the proposed, amendment to paragraph 1.19a  
-Delete 'to help' so that the sentence reads 'The council has prepared a strategic housing market assessment (SHMA) to ensure its full objectively assessed housing needs in the housing market area over the planned period up to 2029 are met.'

**Respondent Number:** 216 **Comment Number:** 3 **Respondent Name:** Mr & Mrs Hawkes

**Respondent Organisation:** Crest Homes (SW)

**Agent ID:** 174 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA3

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The Council has not 'undertaken an assessment of the needs of development within the District during the plan period' as described in CSA3 (paragraph 1.19a) to comply with paragraph 47 of the NPPF. An objection is therefore made to the Council's assessment of needs within the district during the plan period, which is reported as assessing the space needed for economic growth, housing, retail provision and social needs whilst also taking into account the Council's objective of promoting 'a higher value economy rather than only volume growth.'

The geography of the SHMA was discussed at the Hearing session on 17th September and there remain significant issues about the reliance that can be placed on the SHMA, as amended by Addenda 1a to 1c, which have been addressed in Statements for the Hearing sessions on 10th and 11th December.

Even if it is accepted that a SHMA can be prepared for just the District, it is still necessary to consider the implications of housing needs of neighbouring areas and especially Bristol, which have not been fully considered (contrary to the assertion in paragraph 1.18).

**Change to the policy requested:**

A more robust assessment is required of future housing requirements, recognising the underlying demographic, social and economic forces for change, based on a long-term view of trends in migration, household formation and economic activity and taking account of the impacts of housing demand in adjoining districts – in particular Bristol.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

**Respondent Number:** 248 **Comment Number:** 3 **Respondent Name:** **Respondent Organisation:** Crest Strategic Projects  
**Agent ID:** 30 **Agent Name:** RPS Planning & Development  
**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA3  
**Location:**

**Comment made on the Proposed Change:** Support:

1) R1) The paragraph should be amended to reflect the fact that SHMA does not assess a recognised HMA; it is a SHMA for a district that bears no resemblance to a functional HMA.

**Change to the policy requested:**

Last sentence of paragraph 1.19a to read:  
 "The Council has prepared prepare a Strategic Housing Market Assessment (SHMA) to help assess its full objectively assessed housing needs in the housing market area District over the plan period up to 2029."

**Respondent Number:** 2564 **Comment Number:** 13 **Respondent Name:** **Respondent Organisation:** Waddeton Park Limited  
**Agent ID:** 128 **Agent Name:** Peter Brett Associates  
**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA3  
**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:** Support:

5. Change CSA3 makes reference to the new SHLAA and we would also like to make specific comments relating to the SHLAA which have a direct impact on the supply of sites identified by the Council and on the housing delivery figures identified in the changes to the policies.

The SHLAA

6. The SHLAA has not been done according to a robust methodology. It has not used a developer panel to test assumptions, delivery rates and timescales to inform the trajectory that it relies upon to set out the housing provision figure. Paragraph 1.11 of the SHLAA Findings Report states that 'Whilst no developer panel has been convened during the preparation of the SHLAA, the findings are open and transparent and enable interested parties to critically review the outputs and relay any observations to the Council for consideration'. Consequently the SHLAA must only be considered as a draft for consideration and consultation; however, this does not appear to be how it is being used. The figures are directly fed into the Core Strategy amendments with no acknowledgement that they need to be tested and there does not appear to be a proper mechanism to comment on the SHLAA and provide comments to the Council. It is surprising, in view of the untested nature of the SHLAA, that no allowances are included within the calculations for the non delivery of sites.

7. We are particularly concerned that the SHLAA includes a number of sites without planning permission and with no proper assessment of their achievability. This is particularly so in terms of the constraints that may exist for these sites, the effect of their existing land use value on a proper viability assessment in accordance with Framework and the Harman Report, and the ability of sites to deliver the assumed number of market and affordable dwellings. We have not considered every site in the SHLAA and trajectory, but consideration of one site which we are very familiar with (the former Focus DIY centre in Midsomer Norton) demonstrates that there is a lack of information provided about their achievability and the constraints that exist. If this paucity of information is replicated across the whole area there must be considerable doubt about the quality of the outputs and concern about their reliability for use within the trajectory to inform the housing supply figures.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:****Respondent Number:** 2564 **Comment Number:** 6 **Respondent Name:****Respondent Organisation:** Strategic Land Partnerships**Agent ID:** 128 **Agent Name:** Peter Brett Associates**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA3**Location:** Comment on multiple Strategic Sites**Comment made on the Proposed Change:**Support: 

6. Change CSA3 makes reference to the new SHLAA and we would also like to make specific comments relating to the SHLAA which have a direct impact on the supply of sites identified by the Council and on the housing delivery figures identified in the changes to the policies.

The SHLAA

7. The SHLAA has not been done according to a robust methodology. It has not used a developer panel to test assumptions, delivery rates and timescales to inform the trajectory that it relies upon to set out the housing provision figure. Paragraph 1.11 of the SHLAA Findings Report states that 'Whilst no developer panel has been convened during the preparation of the SHLAA, the findings are open and transparent and enable interested parties to critically review the outputs and relay any observations to the Council for consideration'. Consequently the SHLAA must only be considered as a draft for consideration and consultation; however, this does not appear to be how it is being used. The figures are directly fed into the Core Strategy amendments with no acknowledgement that they need to be tested and there does not appear to be a proper mechanism to comment on the SHLAA and provide comments to the Council. It is surprising, in view of the untested nature of the SHLAA, that no allowances are included within the calculations for the non delivery of sites.

8. We are particularly concerned that the SHLAA includes a number of sites without planning permission and with no proper assessment of their achievability. This is particularly so in terms of the constraints that may exist for these sites, the effect of their existing land use value on a proper viability assessment in accordance with Framework and the Harman Report, and the ability of sites to deliver the assumed number of market and affordable dwellings. We have not considered every site in the SHLAA and trajectory, but consideration of one site which we are very familiar with (the former Focus DIY centre in Midsomer Norton) demonstrates that there is a lack of information provided about their achievability and the constraints that exist. If this paucity of information is replicated across the whole area there must be considerable doubt about the quality of the outputs and concern about their reliability for use within the trajectory to inform the housing supply figures.

**Change to the policy requested:****Respondent Number:** 4695 **Comment Number:** 2 **Respondent Name:** Richard Hemmings**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA3**Location:** Comment on Alternative Options**Comment made on the Proposed Change:**Support: 

2.1 As the launch document clearly sets out the Core Strategy is key to the delivery of the Placemaking plan as it needs to expand on the strategic vision that the Core Strategy sets out.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

2.2 Since the submission draft of the Core Strategy was submitted the Inspector, Mr Simon Emerson, has raised significant concerns regarding a number of key strategic issues. Over the course of the examination a large number of issues have been raised but in summary we consider the most significant and relevant to these to include:

- Concerns regarding the housing requirement for BANES as a whole;;
- Concerns over delivery of housing and the need for measures to encourage housing to be delivered sooner in the plan period;;
- Required BANES to consider historic shortfall and the need to apply a 20% buffer because of persistent under delivery to its five year housing land supply;;
- Affordable housing requirements needed further analysis;; and
- Concerns about the analysis of the evidence base that has underpinned the current strategy in relation to the Greenbelt.
- Further work was required to sequential and exception flood risk tests.

2.3 While the council has sought to address some of these concerns a large number of significant issues remain unresolved. Currently the examination is due to reopen to consider these issues further and in particular the relevant housing requirement.

2.4 It is clear that the resolution of these key issues are unlikely to happen soon, this will lead to further delay in the adoption of a Core Strategy, without which the overall strategic vision for the district, including the key matter of how much development needs to be accommodated within BANES, and specifically Keynsham, will remain undefined.

2.5 In light of this it is our opinion a large number of key issues remains outstanding which are critical to the preparation of the Placemaking Plan. In particular these include the overall housing requirement proposed for BANES as a whole, how this will deliver sufficient affordable housing and how the significant undersupply of five year housing land will be addressed.

2.6 Because the overall housing requirement for BANES as a whole is yet to be objectively tested and agreed as part of the Core Strategy work on the Placemaking plan is premature.

2.7 The reason for this is clear, if the proposition of many consultees involved in the Core Strategy process is correct and the overall housing requirement for BANES needs to be increased then the Placemaking plan will have to accommodate significantly more growth than it currently seeks to provide.

2.8 Therefore, our specific comments on the launch document are given without prejudice to our assertion that the preparation of the Placemaking plan should be suspended until the Core Strategy is adopted.

**Change to the policy requested:**

**Respondent Number:** 4702 **Comment Number:** 1 **Respondent Name:** Richard Cross

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA3

**Location:** Comment on Alternative Options

**Comment made on the Proposed Change:**

**Support:**

See attached letter RCC 19/12/13

**Change to the policy requested:**

I request that no land should be removed from the Green belt on the Odd Down/Southstoke site.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4803 **Comment Number:** 3 **Respondent Name:** Simon Steel-Perkins**Respondent Organisation:** Waddeton Park Limited**Agent ID:** 128 **Agent Name:** Peter Brett Associates**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA3**Location:****Comment made on the Proposed Change:**Support: 

5. Change CSA3 makes reference to the new SHLAA and we would also like to make specific comments relating to the SHLAA which have a direct impact on the supply of sites identified by the Council and on the housing delivery figures identified in the changes to the policies.

The SHLAA

6. The SHLAA has not been done according to a robust methodology. It has not used a developer panel to test assumptions, delivery rates and timescales to inform the trajectory that it relies upon to set out the housing provision figure. Paragraph 1.11 of the SHLAA Findings Report states that 'Whilst no developer panel has been convened during the preparation of the SHLAA, the findings are open and transparent and enable interested parties to critically review the outputs and relay any observations to the Council for consideration'. Consequently the SHLAA must only be considered as a draft for consideration and consultation; however, this does not appear to be how it is being used. The figures are directly fed into the Core Strategy amendments with no acknowledgement that they need to be tested and there does not appear to be a proper mechanism to comment on the SHLAA and provide comments to the Council. It is surprising, in view of the untested nature of the SHLAA, that no allowances are included within the calculations for the non delivery of sites.

7. We are particularly concerned that the SHLAA includes a number of sites without planning permission and with no proper assessment of their achievability. This is particularly so in terms of the constraints that may exist for these sites, the effect of their existing land use value on a proper viability assessment in accordance with Framework and the Harman Report, and the ability of sites to deliver the assumed number of market and affordable dwellings. We have not considered every site in the SHLAA and trajectory, but consideration of one site which we are very familiar with (the former Focus DIY centre in Midsomer Norton) demonstrates that there is a lack of information provided about their achievability and the constraints that exist. If this paucity of information is replicated across the whole area there must be considerable doubt about the quality of the outputs and concern about their reliability for use within the trajectory to inform the housing supply figures.

**Change to the policy requested:****Respondent Number:** 5130 **Comment Number:** 2 **Respondent Name:** Kenneth McKelvey**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA3**Location:****Comment made on the Proposed Change:**Support: 

My second comment is that the analysis supporting the supposed "objectively assessed need" for an increase in housing in the BANES area is wrong. I do not mean that it is "wrong in my opinion". I mean that the calculations are wrong. Opinion Research Services ("ORS"), who made the calculations, have made at least one fundamental arithmetic error in their calculations along with a series of fundamental errors of methodology. As a result the present housing projections are overstated; once corrected the numbers do not support the need to reduce the size of the Green Belt contrary to the

conclusions reached to date.

I will first give my credentials for my conclusion and then explain the errors that have been made.

By profession I am an Actuary (Fellow of the Institute of Actuaries) and also hold an MBA with Distinction from INSEAD, one of the world's top business schools. By occupation I am the Group Managing Director of the Punter Southall Group ([www.puntersouthallgroup.com](http://www.puntersouthallgroup.com)), the largest UK-owned organisation providing actuarial and investment advisory services to a large number of large UK pension funds. As you may be aware, the actuarial training is among the longest and most arduous of all the professions. Given that background I believe that I can claim to be well trained and experienced in demographics, statistics, mathematics, economics and in building population and financial models.

I have reviewed the BANES Strategic Housing Market Assessment Update 2013 and the companion Addendum 1a as developed by Opinion Research Services ("ORS"). I conclude that the population and household projections set out therein are incorrectly calculated, that the housing projections in particular are overstated and that conclusions based on these documents will therefore be wrong.

The quality of the thinking, analysis and modelling that is evident in the SHMA Update 2013 and Addendum 1a prepared by ORS is extraordinarily low by the standards of my profession, members of which are typically engaged to develop long term demographic and financial projections. It is extraordinarily disappointing to find work of such low quality forming the basis for major public policy decisions. ORS is a small organisation of extremely limited resources; very few of its staff have qualifications and experience that are relevant to demographics and population projection. As its name and website amply demonstrate, ORS focuses primarily on social surveys and research. Why did BANES appoint them for a matter of such enormous importance as the Core Strategy? The fact of having carried out housing projections for other local authorities in the past is no answer at all; this simply means that they have probably made mistakes in the past as well. The specific errors that I have identified so far, with only around three hours reading and analysis, are as follow. They completely invalidate the ORS modelling work that led to the projected "objectively assessed need" for housing in the BANES area. I describe all the errors in 'population => housing' order. The most immediately quantifiable and egregious error is item 5) which immediately reduces all projected required housing numbers by around 20%.

1)Ref Addendum 1a, Figure 1 and attached Excel chart: The only factor that has made any significant net difference to the population of Bath over the last ten years is International Migration. Almost all the annual variation in Total Change derives from widely fluctuating levels of International Migration / Out. However, ORS has done no work whatsoever to understand the drivers of the fluctuation of International Migration / Out. To base a twenty year forecast of this factor on simple averages of ten years of highly variable historic data, when all the other historic data series are relatively stable, is incompetent.

Long term population projections that include an international migration component are prone to extreme error because international migration is driven primarily by economic rather than demographic factors. The mere idea of developing twenty year population projections based on ten years of historic data when there is a significant international migration component is risible from first principles. If International Net Migration were only a small component of the SHMA model then this issue might be ignored; but it is not, it is dominant. ORS have made no attempt whatsoever to analyse and model the drivers of Net International Migration over the period 2001-2011 and into the future despite the data exhibiting high variance. The migration assumptions adopted as inputs to PopGroup are point estimates and make no attempt whatsoever to reflect the extreme variability of the International Migration / Out component. As a result the resulting projections are not 'fit for purpose' as a long term planning tool.

2)ORS have made no attempt to estimate the confidence intervals around their central projections of population. Nor is there any discussion of the extent to which those intervals increase rapidly with duration, as they most certainly do. Perhaps they do not understand such issues. Three scenarios are presented which are derived from three averages of the historic data. These do NOT provide a substitute for proper estimation of confidence intervals. Given the high variance of International Migration / Out the three scenarios are almost certainly all 'central' scenarios in the overall plausible distribution of potential futures that are suggested by the available historic data.

ORS give the impression that they think that they can simply plug numbers into PopGroup and that it will automatically produce useful output. In fact the reverse is true in the presence of a dominant component of Net International Migration: PopGroup (and any other demographic projection system) is largely useless in such circumstances. The only thing that will make a fundamental difference is future levels of Net International Migration which are driven by economics, not by demographics and PopGroup and similar systems are not designed to address this.

Once the inputs to PopGroup are in question so is the entire output: "Garbage In, Garbage Out". As a result the projected

figures are wrong both as regards level but also as regards the three scenarios giving any useful indication of the range of potential future outcomes.

3)Ref Addendum 1a, pages 5-7: You asked for new projections separating out the student component of Bath’s population. There is no discussion in the document of how the interplay of the historic student data with the UK Migration and International Migration components of the historic data has been tackled. As a result it is utterly unclear why the projected populations under the two scenarios are absolutely identical and the result is, prima facie, bizarre. It is extraordinary that in the paragraph numbered 13 on page 6 the authors do not comment on why the two approaches give exactly the same answer. In the absence of an explanation one can only assume that they do not know and the impression is given, again, that they are using PopGroup without understanding it.

4)As regards projecting the student population itself: why did ORS not simply ask the universities and colleges about their plans? Natural population evolution is probabilistic in the absence of external events; the size of a student population is predominantly deterministic according to the policies of the institutions in question. There is also the question of the long term impact on student numbers of the recent introduction of student fees. This should at least have been acknowledged as a potential factor. In any event the two processes should be modelled entirely separately.

5)Ref Addendum 1a page 13 and Update Table 1 and Table 2: On Page 13 of the Addendum ORS adopt 2.27 or 2.31 as average household size. This is an utterly critical assumption in deriving projected required numbers and size mix of houses. However, the data in Tables 1 and 2 of the Update show that the average household size of those who formed the net increase in Bath’s population over the last ten years was 2.8 (see Excel spreadsheet). Some such difference is unsurprising since net population Total Change has been dominated by the arrival of International Migrants who have a different average age and different cultural background compared with established residents. The same dominance is projected to continue in future so the average household size assumed for future growth should be the same as that experienced 2001-2011.

Correcting for this would reduce the number of houses required by around 20% and would change the housing mix required. As a result, and correcting for this error alone, the projected required housing numbers and mix in Addendum 1a are overstated by 20%.

6)Addressing the same error in a different way: ORS should have carried out a ‘sense check’ on the projected required numbers of houses by dividing the projected population increase by the household size that was actually experienced in respect of net population increase 2001-2011. Taking the mid-trend Migration Population projection of 16,600 and dividing by 2.8 suggests that 5,900 houses would be needed rather than 8,600, an error of 31% or 46% depending on the denominator adopted.

In summary, the BANES Strategic Housing Assessment Update 2013 and the companion Addendum 1a are wrong. They do not correctly project the “objectively assessed need” for housing in the BANES area. They therefore provide no objective justification whatsoever for the need to decide now to reduce the size of Bath’s Green Belt. Moreover, given the level of uncertainty about future levels of net International Migration to Bath, which has been the sole significant net driver of population change in Bath, there is no justification to do so now within any sensible definition of confidence limits around future housing needs. The amount of land available without drawing on the Green Belt far exceeds the level of housing demand that could be forecast now with any reasonable degree of certainty.

Once you have had a chance to consider the contents of this letter I would be happy to make available some resources from my firm on a ‘pro bono’ basis to carry out a thorough review of the existing projections and make suggestions for their improvement. For this purpose we would require copies of all the data that has been used and interim use of a copy of PopGroup.

**Change to the policy requested:**

**Change Reference: CSA5**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 222 **Comment Number:** 1 **Respondent Name:****Respondent Organisation:** Duchy of Cornwall**Agent ID:** 126 **Agent Name:** Woolf Bond Planning LLP**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA5**Location:** Comment on Alternative Options**Comment made on the Proposed Change:**Support: 

- 1.1. Examination of the Core Strategy has extended over a period of almost two years, within which there have been numerous changes to the planning system including, but not limited to, (i) publication of the NPPF; (ii) the Localism Act; and (iii) revocation of the RSS tier of plan making.
- 1.2. Since the Core Strategy was submitted to the SoS there have been numerous and substantial revisions to its content, including in relation to the housing requirement and the identification of specific sites in helping to ensure a sufficient supply of housing land.
- 1.3. The Duchy remains concerned about the level of housing growth to be met during the plan period and considers that any failure on the one hand to identify a sufficient level of housing to meet objectively assessed needs and on the other, allocate appropriate sites to deliver the quantum of housing necessary will undermine the approach to maximising the opportunity to provide for sustainable development and maximising the opportunity to address identified housing needs.
- 1.4. As the Council is aware, the Duchy of Cornwall owns land to the west of Twerton, which land was identified in the Council Spatial Options Paper of 2009 as its Preferred Option for an urban extension. The proposal was subsequently omitted from later iterations of the Plan for reasons which have not been made transparent and for which there is a lack of credible evidence base. On the contrary, there are no technical reasons limiting to the identification of the site for development in helping to meet housing and employment needs which matter is summarised in our submissions. The site remains available for development in providing an opportunity for a sustainable urban extension at Bath.
- 1.5. The Duchy remains of the view, supported by the technical evidence base that has been undertaken to date, that the site provides an opportunity to plan for a sustainable urban extension of 1,500 to 2,000 dwellings together with associated employment provision, open space and sustainable transport, cycle and pedestrian linkages to the city centre without serious conflict with the overall purpose of the Green Belt.
- 1.6. The site remains available for consideration as part of the ongoing examination into the “soundness” of the Council’s spatial strategy in helping to (i) meet identified housing needs during the plan period (NPPF, paragraph 47), (ii) ensure a flexible supply of housing land (NPPF, paragraphs 21 and 157) and; (iii) provide for a Green Belt boundary that is capable of ending beyond the plan period (NPPF, paragraph 84).
- 1.7. Duly completed response forms are submitted in support of our representations.
- 1.8. Our detailed comments are set out below and relate to the following amendments:-
- Development Needs and the Scale and Location of Growth: CSA3, CSA6, CSA14
  - The Allocation of Land for Development at Bath and Green Belt Considerations: CSA7, CSA10, CSA20, CSA22, CSA25 and CSA50.
  - The Allocation of Land for Development at Keynsham and Whitchurch: CSA22, CSA27 & CSA45
- NPPF (Tests of Soundness and Duty to Cooperate)
- 1.9. In examining the soundness of the Plan it is necessary to consider the content of the NPPF.
- 1.10. Paragraph 182 of the NPPF requires a “sound” local spatial plan to be positively prepared, justified, effective and consistent with national policy.
- 1.11. The NPPF also sets out the specific outcomes that the planning system should deliver and sets out a requirement for

development plans to take into account evidence of current and future levels of need and demand for housing and affordability levels based upon, inter alia, local and sub-regional evidence of need and demand as set out in SHMAs. The duty to cooperate is set out at Section 33A of the Planning and Compulsory Purchase Act 2004 and carried forward under Part 6 (Sec.110) of the Localism Act 2011 and the requirements of which are relevant to the examination of the soundness of the Core Strategy.

1.12. For the reasons set out in our submissions, we are of the view that the Core Strategy continues to fail the following tests of soundness:

- Positively Prepared. The housing requirement to be met during the plan period (2011 to 2029) has not been satisfactorily demonstrated to be based upon objectively assessed development needs and/or represent the most appropriate strategy in the circumstances.
- Justified. The suggested approach to (i) establishing a housing requirement (ii) housing delivery; and (iii) distribution does not represent the most appropriate strategy when considered against the reasonable alternatives.
- Effective. The approach to addressing housing growth and delivery has not been demonstrated to be deliverable.
- Consistent. The proposals are not consistent with national policy in that they fail to provide a sufficient supply of deliverable/developable housing land.

#### Suggested Changes

1.13. The CS should be amended in accordance with our detailed representations.

We are of the view that further changes are necessary in order make the Core Strategy 'sound'. This includes:

- (i) increasing the overall housing requirement,
- (ii) ensuring sufficient deliverable and developable land is available to meet identified needs,
- (iii) reviewing the Council's approach to assessing the relative merits (or otherwise) of the sites allocated for housing following a review of the Green Belt; and (iv) providing for a Green Belt boundary that endures beyond the plan period.

1.14. The matters summarised at paragraph 1.8 above are addressed in collective 'themes' in the proceeding sections of our representations.

## 2.0. Development Needs and the Scale and Location of Growth: CSA3, CSA6, CSA14

### Introduction

2.1. The Examination into the 'soundness' of the Core Strategy took place in January 2012 but was subsequently suspended to allow the Council to review and thereafter justify the housing requirement to be met during the plan period. The Examination sat for 2 days earlier this month and the Inspector has stated that his further (and still preliminary) conclusions in relation to the soundness of the housing requirement will be made available in early January.

2.2. The various submissions to the Examination, including participant statements have referred to various requirement figures to be met during the plan period and these have more recently suggested a need to plan for around 18,000 dwellings in the period 2011 to 2029.

2.3. The housing requirement to be met during the plan period was debated at the resumed Examination sessions earlier this year, with the Council setting out a reliance on migration trends as a justification for their stated housing requirement.

2.4. It remains unclear as to the level of housing that is said to be the objectively assessed need.

2.5. The Amendments to the Core Strategy now propose to disaggregate the housing requirement from the 11,000 figure in the submission Core Strategy (550dpa 2006 to 2026) and the 12,700 contained in the Proposed Changes (April 2013) for the period 2011 to 2029 (705dpa) to 8,727 (485dpa) and which figure is sub-divided into market and affordable demand (5,437 and 3,290 dwellings respectively).

2.6. Table 1A sets out the disaggregated component parts in setting out the 8,727 'need' figure whilst Table 1B and the accompanying text at paragraphs 1.26b and 1.26c set out a supply figure totalling 12,956 dwellings which is 4,229 dwellings greater than the 8,727 figure.

2.7. Based upon the evidence presented at the resumed Examination sessions, we are of the view that the 12,956 figure should be expressed as the minimum need to be met during the plan period.

2.8. The Duchy's overriding concern is that the 8,727 requirement figure, if expressed as the level of 'need' to be met during the plan period fails to meet objectively assessed needs, which matter was debated at the recent Examination sessions. In addition, and of equal concern is the lack of clarity in the Amendments as to what figure will be used to monitor progress in demonstrating an up to date five year supply of deliverable housing land.

2.9. The 8,727 dwelling requirement figure fails to boost significantly the supply of housing as required at paragraph 47 of the NPPF. Moreover, this level of growth is below that set out under the various growth scenario summarised below:

1. Local Plan (1996-2011) 6,885 (457dpa)
2. SoS Proposed SWRSS Changes 21,300 (1,065dpa)
3. SWRSS Panel's Report 18,800 (940dpa)
4. BANES SHMA (affordable need only) 16,940 (847dpa)
5. Draft South West RSS 15,500 (775dpa)
6. BANES Spatial Options 2009 15,500 (775dpa)
7. Baker Associates 14,500 (725dpa)
8. IPPR Trading 14,400 (720dpa)
9. ID/7, paragraph 2.8 12,100 (605dpa)
10. Woodhead Report 11,600 (580dpa)
11. Submission Draft CS 11,000 (550dpa)
12. Proposed Changes to the CS (2011-2029) 12,700 (705dpa)
13. Core Strategy Amendments I (2011-2029) 8,727 (484dpa)
14. Core Strategy Amendments II (2011-2029) 12,956 (720dpa)

NOTES: scenarios 2 to 11 cover the period 2006 to 2026 whilst 13 relates to the 'need' figure and 14 is the 'supply' figure.

2.10. BNES/50 highlights the principal issues between the development industry and BANES in relation to the modelling of a housing requirement based upon variances of population projections. We do not dissent from that position given the concerns raised in relation to certain of the SHMA forecasts and assumptions contained therein.

2.11. On the basis of the foregoing, including for the reasons set out at the recent Examination session, a determining factor in deriving an appropriate requirement figure is the adequacy of the Council's assessment of and reliance on past trends (including levels of migration) in deriving/extrapolating future trends and thus the likely need for housing.

2.12. This is of particular concern in Bath where housing growth in particular has been constrained due to the lack of housing completions in the last 5-10 years when compared with the implied annualised requirement.

2.13. In addition, and which matter we have already set out in earlier submissions, relying on ONS interim population projections for the ten year period 2011 to 2021 may result in a further under-estimate of the likely population growth, particularly given the wording at page 19 of the DCLG's Housing Statistical Release on Household Interim Projections (April 2011) where it is advised that:

"...the long-term trend in household numbers of previous demographic trends in the population and household formation rates were to continue into the future. These interim projections only span for a 10-year period so users that require a longer time span would need to judge whether recent household formation trends are likely to continue."

2.14. This matter has been considered in the Inspector's interim conclusions on the stage 1 (housing) matters to the examination of the South Worcestershire Development Plan (28 Oct 2013) where the Inspector concluded that the 2011-based projections reflect the fact that past household formation has been suppressed by a combination of reduced supply and lower effective demand with the corollary being that in more favourable economic conditions that are expected in future years there will almost certainly be a return to higher rates of household formation. The Inspector goes on to state: "Thus it would be unwise to rely on the household growth rates shown in the 2011-based projections persisting throughout the plan period."

2.15. This issue is also identified in the NPPG at ID2a-015-130729 where it is stated that the household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation

rates which are not captured in past trends e.g. formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment of housing need will therefore need to reflect the consequences of past under delivery of housing. It is further added that as household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.

2.16. On the basis of the foregoing, including for the reasons set out in BNES/50 and the need to ensure the Local Plan meets housing needs in full, a higher trend migration figure should be applied as this has the best prospect of addressing any shortcomings by previous under provision in housing which may have served to suppress migration trends.

2.17. The Duchy is seeking to ensure that the Local Plan provides for an appropriate level of housing growth in line with objectively assessed needs as required by the NPPF.

2.18. The fact that migration trends, on which primary basis the requirement figure has been derived, fail to reveal the true extent of housing need, the 12,956 figure should be included in the Core Strategy as the minimum requirement to be met during the plan period.

2.19. Failing to plan for an appropriate level of housing growth during the plan period could have significant social, economic and environmental consequences acting as a brake to economy recovery and growth. In terms of housing, under provision could displace demand to other locations and encourage higher levels of commuting<sup>1</sup>. This is particularly the case in relation to the city of Bath where a failure to identify sufficient levels of growth/housing allocations could lead to unsustainable commuting patterns which adverse effect has already been acknowledged in the evidence base to the Core Strategy as an issue given that the Council's own evidence clearly states that the need for housing is at Bath. Yet, and notwithstanding, the Core Strategy fails to plan for sufficient housing opportunity and choice at bath which matter could be addressed through the allocation of land west of Twerton either as a baseline or reserve site in helping to meet identified housing needs both during and beyond the plan period.

2.20. As already made clear by the Examination Inspector, the Plan is not one that is to be assessed in light of the statutory duty to cooperate with neighbouring authorities under S33A of the 2004 Act and that it's provisions cannot be applied retrospectively to plans submitted for examination prior to the date on which the statutory duty came into force (15 November 2011). However, and as set out in the NPPF, the requirement remains under the auspices of the framework to undertake collaborative working with adjoining authorities.

2.21. As set out in the South Gloucestershire Council Core Strategy Inspector's report, outright rejection of the Plan would undermine the proper planning of the District. There are obvious parallels with the extended process endured in relation to the Bath Core Strategy. In that case, the Inspector allowed adoption of the Plan subject to an early review to take account of the collaborative approach to meeting housing needs in the sub region as part of the West of England unitary Authorities programme to undertake a SHMA and thereafter pursuing complementary strategies capable of delivering and supporting economic growth across the sub-region.

2.22. If the Inspector is minded to find the Core Strategy sound on the basis of a minimum housing requirement to be identified through upper case policies, it should only be with the caveat that the Council should aim to adopt a replacement plan in tandem with working ongoing in relation to the Unitary Authorities' SHMA process so that a review/replacement plan is in place by the end of 2018. This would allow the Council time to take into account the implications of the Unitary Authorities' SHMA, to assess its housing land supply position and enable the Council to re-examine strategic development options, including necessary adjustments to the Green Belt boundaries<sup>2</sup>.

**Change to the policy requested:**

2.23. The Core Strategy should be revised with reference to the need to meet the 12,956 dwelling requirement as a minimum during the period 2011 to 2029. This may necessitate the allocation of additional land to ensure a deliverable and developable supply of housing land.

2.24. The Plan should also include a policy requirement for an early review together with a full review of the Green Belt boundaries with the replacement/review plan to be in place by the end of 2018.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

**Respondent Number:** 222 **Comment Number:** 4 **Respondent Name:** Woolf Bond Planning LLP  
**Agent ID:** 126 **Agent Name:** Woolf Bond Planning LLP

**Respondent Organisation:** Duchy of Cornwall

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA5

**Location:** Comment on Alternative Options

**Comment made on the Proposed Change:**  **Support:**

Exam  
 4.1. It is unclear how this dispersal strategy has been assessed in the CS and/or SA as representing the most appropriate strategy having regard to the alternatives, including providing for additional housing growth in the form of a review of the Green Belt to the south west of Bath at Twerton given, in particular, that the need for housing is at Bath.  
 4.2. Providing for growth at Whitchurch and Keynsham is likely to address housing needs arising from Bristol, which matter we have addressed at paragraphs 3.5 and 3.7 above.

**Change to the policy requested:**   
 4.3. Should the Inspectors further preliminary conclusions (to be published in early January) indicate that the Examination is to proceed, the spatial approach to meeting housing needs, including through the 'dispersal' strategy is a matter that requires further analysis in so far as the housing need is at Bath such that a logical conclusion is for additional housing allocations to be identified at Bath

**Respondent Number:** 263 **Comment Number:** 1 **Respondent Name:** Dave Ogborne  
**Agent ID:** **Agent Name:**

**Respondent Organisation:** Wessex Water

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA5

**Location:**

**Comment made on the Proposed Change:**  **Support:**

Thank you for the invitation to comment upon the Core Strategy amendments. I confirm that Wessex Water wish to remain on the Planning Policy Mailing List for ongoing consultations.

We note that proposals allow for further strategic site allocations at;

Odd Down	300 units
Weston	150 units
East Keynsham	250 units
South West Keynsham	200 units
Whitchurch	200 units

Wessex Water has previously advised upon these sites and wish to ensure that infrastructure improvements are considered during the master-planning process.

Most of these sites will require detailed engineering appraisal to confirm the scope and extent of capacity improvements for water and waste water services. Appraisal works will engage with site developers to confirm points of connection and establish an appropriate drainage strategy for foul and surface water drainage systems. Off-site network improvements will be phased where possible to ensure that service levels for sewer flooding and water quality meet emerging standards relating to the Water Framework Directive and comply with flood risk measures.

Further site allocations and safeguarded land at Keynsham will contribute to cumulative catchment impacts and additional capacity will be required for critical sewers. Increased foul flows are also likely to trigger hydraulic improvements at Keynsham sewage works.

These additional allocations have not been assessed in current investment plans over the next 5 year period and we anticipate that these sites will be brought forward through the planning process and emerge later within the plan period. If these sites accelerate through the planning process and secure early permissions we will seek to condition approvals subject to capacity improvements and proportional contributions under requisition arrangements.

Please note that Bristol Water are responsible for water supply at Keynsham and Whitchurch. If any further information is required at this stage please contact Wessex Water to discuss your requirements.

**Change to the policy requested:**

**Change Reference: CSA6**

<b>Respondent Number:</b> 98	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Mark O'Sullivan	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>		<b>Attachments sent with the comment?</b> <input type="checkbox"/>	

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:** Support:

Two of the sites affect Bath: the South Stoke plateau and the Lansdown-Weston re-entrant. My personal view remains, as I have said before, that there is a single housing market for the greater Bristol area and that it is therefore erroneous, given the extent of the authority's area which is protected as AONB or WHS, their settings, or Green Belt, to assume that all housing demand generated within B&NES must be satisfied within B&NES. Therefore I disagree in principle with the development of these sites.

2 If development must take place, then it seems to me that the details should be considered alongside the details of other housing proposals in the City of Bath area. In particular, there are serious questions around transport, where the geography of the city is very difficult. Transport is highly controversial in Bath, and an issue which councillors have had difficulty in grasping. Transport problems have for many years been serious and deteriorating, they have been inadequately addressed in the JLTP, the previous administration's attempt to tackle one major issue through a rapid transit project was controversial and was cancelled when the Council changed hands, and though a high-powered Transport Commission was set up a few months ago there is as yet no clear indication whether or when its conclusions will result in action on the ground. Effects are not only on freedom of movement and general amenity, but also on air pollution, where particulate levels are around twice the EU limit. It is important to the city that it avoids the wrong sort of additional housing, or housing in the wrong place, not only for landscape or heritage reasons, but because the city would face serious economic damage if traffic problems got much worse. Hence I am not at all convinced that it makes sense to consider separately and in advance of the rest of the Placemaking Plan the proposed development areas on the South Stoke plateau and Lansdown-Weston re-entrant.

3 If they must be considered, despite all this, I would hope that the plan might contain policies to ensure that the Council retains a later ability, once it comes to consider the whole context of transport policy and the detail of housing provision in the city, to restrict the generation of traffic (e.g. through restrictions on parking provision) and to require on these sites facilities which may in future be required for transport purposes (e.g. future Park and Ride provision). The material on transport in the proposed draft at pages 21-22 and 28 is fine as far as it goes, but is very local and does not address for example the impact on traffic volumes generally in the city, and more particularly on Wellsway, Bradford Road, North Road, Lansdown Road and the Upper Bristol Road, especially during the school runs and at the major times when traffic is generated by the University of Bath and by the Royal United Hospital.

4 If development must be conceded, there are also of course also landscape issues which are important. At the South Stoke plateau there are important skyline issues from the land below to the south in the Cambrook valley, and also

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

issues of the integrity of South Stoke village itself; there is in addition the question of how to handle the Wansdyke which bisects the site. The former could probably be dealt with by requiring the provision of amenity woodland on all parts of the site south of an east-west line running through Sulis Manor; the WHS-related policies on p 20 of the proposed draft would be satisfactory if the vague reference to the "southern boundary" was amended to read "southern part". The Wansdyke is more difficult, but should certainly be retained as a landscape feature; and as to the Lansdown-Weston re-entrant, one would want to ensure that green landscaping was generous, but I am not sure that I would urge any other particular measures. On both these matters the WHS-related policies on pp 21-22 and 26-27 of the proposed draft are in my view satisfactory.

**Change to the policy requested:**

**Respondent Number:** 170 **Comment Number:** 3 **Respondent Name:** Mr David Batho **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The objectively assessed housing needs of 8,727 (5,437 market + 3,290 affordable) set out in CSA6 (Para 1.26a, Table 1A) are noted and accepted.

However, it is not accepted that, as stated in Para 1.26b and Table 1B, 4,209 more market houses are required to enable delivery of the affordable housing requirement. This is a significant (77%) increase to the objectively assessed market housing requirement and would result in 1,100 houses being built in Green Belt, Bath's WHS landscape setting and the Cotswolds AONB.

The proposed strategy is extremely alarming, not least because B&NES housing figures indicate that, compared to the objectively assessed total housing requirement of 8,727, 11,856 houses can be accommodated on non Green Belt land. This latter figure includes 2,935 affordable houses; this is 24.75% of the total houses planned on non Green Belt land and only 355 short of the affordable houses target.

It is clear that by increasing this percentage, by just 3% to 27.75%, the affordable housing target could be achieved on non Green Belt land and hence, there would be no requirement to build any houses in the Green Belt, particularly market houses which are surplus to requirements. The obligations of B&NES are clear - housing needs must be met but the Green Belt and Bath's world class and unique landscape setting must also be conserved and enhanced.

The housing strategy set out in CSA6, which centres on overprovision of market houses (demonstrably surplus to needs) to meet affordable housing requirements and results in consequent erosion of the Green Belt, fails to meet these obligations in a responsible way. The strategy is unjustified and inconsistent with the great importance which NPPF policies attach to Green Belt and conservation and enhancement of both natural and historic environments. The amendment, therefore, makes the Core Strategy unsound.

**Change to the policy requested:**

**Respondent Number:** 170 **Comment Number:** 3 **Respondent Name:** Robert Hitchins Ltd **Respondent Organisation:**

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

Support:

An objection is made to changes proposed to paragraph 1.26 a – d entitled “the scale and location of growth.”

The Council’s approach to housing requirements as now set out in CSA6 appears to be different from the approach taken in the Proposed Changes and explained in the Council report of 4 March and in BNES/48 (undated, but produced in mid September, following the SHMA seminar on 2 August) which purports to explain SHMA Addenda 1a, 1b, and 1c.

There are several relatively insignificant changes in the overall housing figure: from 12,722 in the Council Report of March 2013 or 12,274 to 12,749 in Table 4 of Annex 1 of that Report; to 12,700 in the Proposed Changes to 12,749 in BNES/48; to 12,956 in CSA6 (paragraph 1.26b) of the Schedule of CS Amendments (which should be 12,936 unless the affordable housing figure is meant to be 3,310 rather than 3,290); and to ‘around 13,000 homes’ in Policy DW1 (CSA14).

However the more significant change is what seems to be an attempt to present the headline figure of 12,956 (or 12,936) or ‘around 13,000’ as an estimate of housing land supply in Table 1B of CSA6, rather than a requirement on the demand side of the equation, as explained in the earlier documentation.

This change of ‘interpretation’ appears to be a sleight of hand to avoid assessing 5-year housing land requirements on the basis of the headline figure for total housing requirements. It requires far more explanation and justification than is presented in CSA6 or BNES/52, which was promised to provide further explanation but is not at all clear.

There are several errors in BNES/52 that make it difficult to follow, including 2.1, 3.34, the following table and Table A2ii (not including spelling errors that we consider to be de minimis). Having ‘read with precision the construction of NPPF paragraph 157’ we are unable to see how it supports a ‘more refined approach’ to housing land supply based on disaggregating market and affordable housing. It is misleading to separate the requirements for market and affordable housing when the delivery of most affordable housing is dependent on planning obligations linked to market housing.

The answers to 3.34 in BNES/52 (p 27ff) confuse requirements and supply; they appear to say that 12,956 is simply a forecast of supply, which fortuitously delivers (exactly) the requirement for affordable housing (3,310) by ‘over-supplying’ market housing (by 9,646 rather than 5,437). The basis for 12,956 as a supply figure and its relationship to the headline requirement figure included in the Proposed Changes require a full explanation from the Council.

Among the many contradictions that are not explained is how the apparent ‘over-supply’ of market housing (by 9,646 rather than 5,437) can be delivered – if there is no demand/requirement for this number of market homes. BNES/52 offers ‘smoke and mirrors’ rather than an explanation for the housing figures in Tables 1A and 1B of CSA6.

The NPPF expects Local Plans to meet the full, objectively assessed needs across their housing market area. Emerging Government Guidance confirms that needs should be assessed first, and independently of possible constraints to meeting them.

The Core Strategy had included a housing requirement of 12,700 dwellings in Policy DW1, this figure is proposed to be replaced by a table which sets out that the objectively assessed housing requirement comprises: - market housing 5,437 plus affordable housing 3,290 dwellings giving a total of 8,727 dwellings. The amendment CSA6 states that it is against these figures that the implementation of the plan will be monitored. “A five year land supply of specific deliverable sites will be maintained against this disaggregated District wide requirement for both market and affordable housing....”

The Inspector’s note ID 40 at paras 14 and 15 clearly states that the housing land supply should be assessed against the housing requirement in the Plan i.e. 12,700 dwellings.

Para 14 states that:

“NPPF paragraph 47 refers to identifying sufficient deliverable sites to provide 5 years’ worth of housing against the housing requirement, plus an appropriate buffer. In my view, the housing requirement is the requirement that has been (or, in this case, is proposed to be) identified in a Council’s up-to-date, adopted development plan. It is the scale of

housing that the Council is proposing to deliver.”

Para 15 states that:

“... the council’s approach is not justified. It seeks to calculate the 5 year supply on the basis of the selected household projection (plus front-loaded local plan backlog) rather than the headline requirement which will be set out in the Core Strategy....More importantly the Council has concluded that 12,700 new homes are necessary and should be delivered over the plan period. This is what the council is promising to do and therefore this is the figure against which its delivery should be judged in calculating the 5 year supply.”

BNES 51 states that the Council has proposed amendments to Policy DW1 but the full explanation of this “will be more helpfully set out as part of the Council’s broader response to ID/42.” In other words the justification will not be available until the Council have prepared and submitted their Hearing Statements on 22nd November. BNES 52 which responds to the Inspector’s questions in ID/42 was published after 22nd November during the consultation period on the Core Strategy Schedule of Amendments.

The objective assessment of housing need now only indicates a figure of 8,727 dwellings for the plan period when previously the figure included in the plan was 8,637 dwellings (source: BANES 48 para 20) The justification for this appears to be based on the revised SHMA and sensitivity testing. Pegasus Group have commented on this and prepared a Hearing Statement for the examination sessions on 10th and 11th December. Without repeating our Hearing Statement, in summary we object to the revised housing provision as proposed in the Schedule of Core Strategy Amendments November 2013.

Whilst the SHMA has been revised since the Core Strategy Proposed Changes was produced and considered by the Council on 4th March, it is widely accepted and also evident in various documents produced by the Council that there has been an undersupply of housing and that there is a significant affordability issue in BANES, ( Proposed Change CSA 3 to new para 1.19b states that in terms of affordable housing need, Bath has one of the widest house price to earnings ratios outside of London and affordability varies across the district.)

National guidance states that, “the assessment will need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.”

The SHMA for Bath and North East Somerset (with its addenda) does not fulfil the requirements of the NPPF (para 158), the DCLG Practice Guidance of March 2007 or the draft NPPG.

The Council’s reasoning about the need for additional market housing to deliver the required quantum of affordable housing is full of contradictions. If the additional housing is justified and capable of delivery, it must be part of the planning requirement and must form the basis for calculating the 5 year housing land supply with the addition of the backlog and a buffer as stated in ID/40, paragraph 13 – 15.

There is no justification for a disaggregated district wide housing requirement for both market and affordable housing, the concept is fraught with difficulties in terms of transparency and monitoring. The plan seems to be contradictory stating that the supply of market housing has been boosted to enable the delivery of the total affordable housing requirement. However, the next paragraph 1.26c states that “much of the supply of market housing is on sites that will not yield any affordable housing” so in order to attempt to monitor the supply of housing the Council have devised this disaggregated requirement, however, in practice it is not clear how the delivery of affordable housing will be monitored.

Table 1A Housing Requirement has a figure for affordable housing of 3,290 dwellings this also happens to the same figure in Table 1B Housing Land Supply.

Table 9 Meeting the need for market and affordable housing in BNES 48 explains how the total of 12,749 dwellings is calculated but this table should be reproduced to show how latest figures in the plan in para 1.26a – d area calculated ( Change ref CSA6 in the Schedule of Core Strategy Amendments Nov 2013). Table 9 the figure for total housing is 8,637 which is from Table 2c based on Draft SHMA adjusted 2008 headship rates low trend migration. The figure for affordable housing is from Table 8 Draft SHMA adjusted 2008 headship rates low trend migration. (However, BNES 48 para 34 refers to 3,110 affordable units plus a further 90 units), therefore should the total be 3,200 affordable in Table 1A of the

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

Schedule of Core Strategy Amendments Nov 2013.

**Change to the policy requested:**

It is considered that the plan continues to fail to meet objectively assessed needs in accordance with the NPPF, this failure could have significant social, economic and environmental consequences., acting as a brake to economic recovery and growth and in terms of housing, under provision could displace demand to other locations and encourage higher levels of commuting and increase the need for affordable housing provision.

The housing requirement plus an appropriate buffer should be included in the plan; this is the figure which should be used in assessing the housing land supply. A disaggregated approach is fraught with difficulties in terms of assessing housing land supply and is unsound.

Tables 1A and 1B in paragraph 1.26 should be revised to show a full objective assessment of housing requirements to meet market and affordable housing needs. The basis for Table 1B should be explained in term of housing requirements and not labelled, confusingly, housing land supply. It should also be consistent with the terminology used in Policy DW1 (CSA14) The total in Table 1B should be consistent with its component parts (which may mean correcting the affordable housing figure).

**Respondent Number:** 180 **Comment Number:** 3 **Respondent Name:** **Respondent Organisation:** J S Bloor Ltd

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**Support: 

The Council has not 'undertaken an assessment of the needs of development within the District during the plan period' as described in CSA3 (paragraph 1.19a) to comply with paragraph 47 of the NPPF. An objection is therefore made to the Council's assessment of needs within the district during the plan period, which is reported as assessing the space needed for economic growth, housing, retail provision and social needs whilst also taking into account the Council's objective of promoting 'a higher value economy rather than only volume growth.'

The geography of the SHMA was discussed at the Hearing Session on 17th September and while the plan has proceeded, there are still significant issues regarding the reliance which can be placed on the SHMA, as amended by Addenda 1a to 1c, and these have been addressed in the Hearing Statement submitted for the Examination Hearing Session on 10th and 11th December 2013.

Even if it is accepted that a SHMA can be prepared for just the District, it is still necessary to consider the implications of housing needs of neighbouring areas and especially Bristol, which have not been fully considered (contrary to the assertion in paragraph 1.18).

**Change to the policy requested:**

A more robust assessment is required of future housing requirements, recognising the underlying demographic, social and economic forces for change, based on a long-term view of trends in migration, household formation and economic activity and taking account of the impacts of housing demand in adjoining districts – in particular Bristol.

**Respondent Number:** 180 **Comment Number:** 4 **Respondent Name:** **Respondent Organisation:** J S Bloor Ltd

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

Support:

An objection is made to changes proposed to paragraph 1.26 a – d entitled “the scale and location of growth.”

The Council’s approach to housing requirements as now set out in CSA6 appears to be different from the approach taken in the Proposed Changes and explained in the Council report of 4 March and in BNES/48 (undated, but produced in mid-September, following the SHMA seminar on 2 August) which purports to explain SHMA Addenda 1a, 1b, and 1c.

There are several relatively insignificant changes in the overall housing figure: from 12,722 in the Council Report of March 2013 or 12,274 to 12,749 in Table 4 of Annex 1 of that Report; to 12,700 in the Proposed Changes to 12,749 in BNES/48; to 12,956 in CSA6 (paragraph 1.26b) of the Schedule of CS Amendments (which should be 12,936 unless the affordable housing figure is meant to be 3,310 rather than 3,290); and to ‘around 13,000 homes’ in Policy DW1 (CSA14).

However the more significant change is what seems to be an attempt to present the headline figure of 12,956 (or 12,936) or ‘around 13,000’ as an estimate of housing land supply in Table 1B of CSA6, rather than a requirement on the demand side of the equation, as explained in the earlier documentation.

This change of ‘interpretation’ appears to be a sleight of hand to avoid assessing 5-year housing land requirements on the basis of the headline figure for total housing requirements. It requires far more explanation and justification than is presented in CSA6 or BNES/52, which was promised to provide further explanation but is not at all clear.

There are several errors in BNES/52 that make it difficult to follow, including 2.1, 3.34, the following table and Table A2ii (not including spelling errors that we consider to be de minimis). Having ‘read with precision the construction of NPPF paragraph 157’ we are unable to see how it supports a ‘more refined approach’ to housing land supply based on disaggregating market and affordable housing. It is misleading to separate the requirements for market and affordable housing when the delivery of most affordable housing is dependent on planning obligations linked to market housing.

The answers to 3.34 in BNES/52 (p 27ff) confuse requirements and supply; they appear to say that 12,956 is simply a forecast of supply, which fortuitously delivers (exactly) the requirement for affordable housing (3,310) by ‘over-supplying’ market housing (by 9,646 rather than 5,437). The basis for 12,956 as a supply figure and its relationship to the headline requirement figure included in the Proposed Changes require a full explanation from the Council.

Among the many contradictions that are not explained is how the apparent ‘over-supply’ of market housing (by 9,646 rather than 5,437) can be delivered – if there is no demand/requirement for this number of market homes. BNES/52 offers ‘smoke and mirrors’ rather than an explanation for the housing figures in Tables 1A and 1B of CSA6.

The NPPF expects Local Plans to meet the full, objectively assessed needs across their housing market area. Emerging Government Guidance confirms that needs should be assessed first, and independently of possible constraints to meeting them.

The Core Strategy had included a housing requirement of 12,700 dwellings in Policy DW1, this figure is proposed to be replaced by a table which sets out that the objectively assessed housing requirement comprises: - market housing 5,437 plus affordable housing 3,290 dwellings giving a total of 8,727 dwellings. The amendment CSA6 states that it is against these figures that the implementation of the plan will be monitored. “A five year land supply of specific deliverable sites will be maintained against this disaggregated District wide requirement for both market and affordable housing....”

The Inspector’s note ID 40 at paras 14 and 15 clearly states that the housing land supply should be assessed against the housing requirement in the Plan i.e. 12,700 dwellings.

Para 14 states that:

“NPPF paragraph 47 refers to identifying sufficient deliverable sites to provide 5 years’ worth of housing against the housing requirement, plus an appropriate buffer. In my view, the housing requirement is the requirement that has been (or, in this case, is proposed to be) identified in a Council’s up-to-date, adopted development plan. It is the scale of

housing that the Council is proposing to deliver.”

Para 15 states that:

“... the council’s approach is not justified. It seeks to calculate the 5 year supply on the basis of the selected household projection (plus front-loaded local plan backlog) rather than the headline requirement which will be set out in the Core Strategy....More importantly the Council has concluded that 12,700 new homes are necessary and should be delivered over the plan period. This is what the council is promising to do and therefore this is the figure against which its delivery should be judged in calculating the 5 year supply.”

BNES 51 states that the Council has proposed amendments to Policy DW1 but the full explanation of this “will be more helpfully set out as part of the Council’s broader response to ID/42.” In other words the justification will not be available until the Council have prepared and submitted their Hearing Statements on 22nd November. BNES 52 which responds to the Inspector’s questions in ID/42 was published after 22nd November during the consultation period on the Core Strategy Schedule of Amendments.

The objective assessment of housing need now only indicates a figure of 8,727 dwellings for the plan period when previously the figure included in the plan was 8,637 dwellings (source: BANES 48 para 20) The justification for this appears to be based on the revised SHMA and sensitivity testing. Pegasus Group have commented on this and prepared a Hearing Statement for the examination sessions on 10th and 11th December. Without repeating our Hearing Statement, in summary we object to the revised housing provision as proposed in the Schedule of Core Strategy Amendments November 2013.

Whilst the SHMA has been revised since the Core Strategy Proposed Changes was produced and considered by the Council on 4th March, it is widely accepted and also evident in various documents produced by the Council that there has been an undersupply of housing and that there is a significant affordability issue in BANES, ( Proposed Change CSA 3 to new para 1.19b states that in terms of affordable housing need, Bath has one of the widest house price to earnings ratios outside of London and affordability varies across the district.)

National guidance states that, “the assessment will need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.”

The SHMA for Bath and North East Somerset (with its addenda) does not fulfil the requirements of the NPPF (para 158), the DCLG Practice Guidance of March 2007 or the draft NPPG.

The Council’s reasoning about the need for additional market housing to deliver the required quantum of affordable housing is full of contradictions. If the additional housing is justified and capable of delivery, it must be part of the planning requirement and must form the basis for calculating the 5 year housing land supply with the addition of the backlog and a buffer as stated in ID/40, paragraph 13 – 15.

There is no justification for a disaggregated district wide housing requirement for both market and affordable housing, the concept is fraught with difficulties in terms of transparency and monitoring. The plan seems to be contradictory stating that the supply of market housing has been boosted to enable the delivery of the total affordable housing requirement. However, the next paragraph 1.26c states that “much of the supply of market housing is on sites that will not yield any affordable housing” so in order to attempt to monitor the supply of housing the Council have devised this disaggregated requirement, however, in practice it is not clear how the delivery of affordable housing will be monitored.

Table 1A Housing Requirement has a figure for affordable housing of 3,290 dwellings this also happens to the same figure in Table 1B Housing Land Supply.

Table 9 Meeting the need for market and affordable housing in BNES 48 explains how the total of 12,749 dwellings is calculated but this table should be reproduced to show how latest figures in the plan in para 1.26a – d area calculated ( Change ref CSA6 in the Schedule of Core Strategy Amendments Nov 2013). Table 9 the figure for total housing is 8,637 which is from Table 2c based on Draft SHMA adjusted 2008 headship rates low trend migration. The figure for affordable housing is from Table 8 Draft SHMA adjusted 2008 headship rates low trend migration. (However, BNES 48 para 34 refers to 3,110 affordable units plus a further 90 units), therefore should the total be 3,200 affordable in Table 1A of the

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

Schedule of Core Strategy Amendments Nov 2013.

**Change to the policy requested:**

It is considered that the plan continues to fail to meet objectively assessed needs in accordance with the NPPF, this failure could have significant social, economic and environmental consequences., acting as a brake to economic recovery and growth and in terms of housing, under provision could displace demand to other locations and encourage higher levels of commuting and increase the need for affordable housing provision.

The housing requirement plus an appropriate buffer should be included in the plan; this is the figure which should be used in assessing the housing land supply. A disaggregated approach is fraught with difficulties in terms of assessing housing land supply and is unsound.

Tables 1A and 1B in paragraph 1.26 should be revised to show a full objective assessment of housing requirements to meet market and affordable housing needs. The basis for Table 1B should be explained in term of housing requirements and not labelled, confusingly, housing land supply. It should also be consistent with the terminology used in Policy DW1 (CSA14) The total in Table 1B should be consistent with its component parts (which may mean correcting the affordable housing figure).

**Respondent Number:** 184 **Comment Number:** 2 **Respondent Name:** Paul Davis

**Respondent Organisation:** Persimmon Homes  
Severn Valley

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**Support: 

Persimmon Homes Severn Valley considers that there is a substantial body of evidence to suggest that the figure of 8727 dwellings does not reflect an objectively assessed housing need for the district. At the last examination hearings on the 10th and the 11th of December, a number of alternative assessments were presented ranging from 14,760 to 20,000 dwellings. Although there is no single agreed figure of the objectively assessed need, reflecting the fact that the process requires a number of assumptions, the one overriding theme of all the other assessments is that the Councils assessment is far too low reflecting substantial flaws in the Councils assumptions which have been well rehearsed at the examinations.

**Change to the policy requested:**

1. PHSV consider that the calculation of the 5 year housing land supply should be based on the total housing requirement rather than on the disaggregated basis proposed by the council change under CSA 6.
2. PHSV also note in the schedule of amendments, the amendment to paragraph 1.26c refers to housing figures set out in table 1B where as the table shown below in the schedule is headed table 1C

**Respondent Number:** 216 **Comment Number:** 4 **Respondent Name:** Mr & Mrs Hawkes

**Respondent Organisation:** Crest Homes (SW)

**Agent ID:** 174 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**Support: 

An objection is made to changes proposed to paragraph 1.26 a – d entitled “the scale and location of growth.” The Council’s approach to housing requirements as now set out in CSA6 appears to be different from the approach taken in the Proposed Changes and explained in the Council report of 4 March and in BNES/48 (undated, but produced in mid September, following the SHMA seminar on 2 August) which purports to explain SHMA Addenda 1a, 1b, and 1c.

There are several relatively insignificant changes in the overall housing figure: from 12,722 in the Council Report of March 2013 or 12,274 to 12,749 in Table 4 of Annex 1 of that Report; to 12,700 in the Proposed Changes to 12,749 in BNES/48; to 12,956 in CSA6 (paragraph 1.26b) of the Schedule of CS Amendments (which should be 12,936 unless the affordable housing figure is meant to be 3,310 rather than 3,290); and to 'around 13,000 homes' in Policy DW1 (CSA14).

However the more significant change is what seems to be an attempt to present the headline figure of 12,956 (or 12,936) or 'around 13,000' as an estimate of housing land supply in Table 1B of CSA6, rather than a requirement on the demand side of the equation, as explained in the earlier documentation.

This change of 'interpretation' appears to be a sleight of hand to avoid assessing 5-year housing land requirements on the basis of the headline figure for total housing requirements. It requires far more explanation and justification than is presented in CSA6 or BNES/52, which was promised to provide further explanation but is not at all clear.

There are several errors in BNES/52 that make it difficult to follow, including 2.1, 3.34, the following table and Table A2ii (not including spelling errors that we consider to be de minimis). Having 'read with precision the construction of NPPF paragraph 157' we are unable to see how it supports a 'more refined approach' to housing land supply based on disaggregating market and affordable housing. It is misleading to separate the requirements for market and affordable housing when the delivery of most affordable housing is dependent on planning obligations linked to market housing.

The answers to 3.34 in BNES/52 (p 27ff) confuse requirements and supply; they appear to say that 12,956 is simply a forecast of supply, which fortuitously delivers (exactly) the requirement for affordable housing (3,310) by 'over-supplying' market housing (by 9,646 rather than 5,437). The basis for 12,956 as a supply figure and its relationship to the headline requirement figure included in the Proposed Changes require a full explanation from the Council.

Among the many contradictions that are not explained is how the apparent 'over-supply' of market housing (by 9,646 rather than 5,437) can be delivered – if there is no demand/requirement for this number of market homes. BNES/52 offers 'smoke and mirrors' rather than an explanation for the housing figures in Tables 1A and 1B of CSA6.

The NPPF expects Local Plans to meet the full, objectively assessed needs across their housing market area. Emerging Government Guidance confirms that needs should be assessed first, and independently of possible constraints to meeting them.

The Core Strategy had included a housing requirement of 12,700 dwellings in Policy DW1. This figure is proposed to be replaced by a table which sets out that the objectively assessed housing requirement comprises: - market housing 5,437 plus affordable housing 3,290 dwellings giving a total of 8,727 dwellings. The amendment CSA6 states that it is against these figures that the implementation of the plan will be monitored. "A five year land supply of specific deliverable sites will be maintained against this disaggregated District wide requirement for both market and affordable housing...."

The Inspector's note ID 40 at paragraphs 14 and 15 clearly states that the housing land supply should be assessed against the housing requirement in the Plan i.e. 12,700 dwellings.

Paragraph 14 states that:

"NPPF paragraph 47 refers to identifying sufficient deliverable sites to provide 5 years' worth of housing against the housing requirement, plus an appropriate buffer. In my view, the housing requirement is the requirement that has been (or, in this case, is proposed to be) identified in a Council's up-to-date, adopted development plan. It is the scale of housing that the Council is proposing to deliver."

Paragraph 15 states that:

"... the council's approach is not justified. It seeks to calculate the 5 year supply on the basis of the selected household projection (plus front-loaded local plan backlog) rather than the headline requirement which will be set out in the Core Strategy....More importantly the Council has concluded that 12,700 new homes are necessary and should be delivered over the plan period. This is what the council is promising to do and therefore this is the figure against which its delivery should be judged in calculating the 5 year supply."

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helpfully set out as part of the Council's broader response to ID/42." In other words the justification will not be available until the Council have prepared and submitted their Hearing Statements on 22nd November. BNES 52 which responds to the Inspector's questions in ID/42 was published after 22nd November during the consultation period on the Core Strategy Schedule of Amendments.

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Whilst the SHMA has been revised since the Core Strategy Proposed Changes was produced and considered by the Council on 4th March, it is widely accepted and also evident in various documents produced by the Council that there has been an undersupply of housing and that there is a significant affordability issues in BANES, (Proposed Change CSA 3 to new paragraph 1.19b states that in terms of affordable housing need, Bath has one of the widest house price to earnings ratios outside of London and affordability varies across the district.)

National guidance states that, "the assessment will need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply."

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The Council's reasoning about the need for additional market housing to deliver the required quantum of affordable housing is full of contradictions. If the additional housing is justified and capable of delivery, it must be part of the planning requirement and must form the basis for calculating the 5 year housing land supply with the addition of the backlog and a buffer as stated in ID/40, paragraph 13 – 15.

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**Change to the policy requested:**

Tables 1A and 1B in paragraph 1.26 should be revised to show a full objective assessment of housing requirements to meet market and affordable housing needs. The basis for Table 1B should be explained in term of housing requirements and not labelled, confusingly, housing land supply. It should also be consistent with the terminology used in Policy DW1 (CSA14) The total in Table 1B should be consistent with its component parts (which may mean correcting the affordable housing figure).

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**Respondent Number:** 219    **Comment Number:** 4    **Respondent Name:** Edward Ware Homes Limited    **Respondent Organisation:**

**Agent ID:** 165    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

An objection is made to changes proposed to paragraph 1.26 a – d entitled “the scale and location of growth.” The Council’s approach to housing requirements as now set out in CSA6 appears to be different from the approach taken in the Proposed Changes and explained in the Council report of 4 March and in BNES/48 (undated, but produced in mid September, following the SHMA seminar on 2 August) which purports to explain SHMA Addenda 1a, 1b, and 1c.

There are several relatively insignificant changes in the overall housing figure: from 12,722 in the Council Report of March 2013 or 12,274 to 12,749 in Table 4 of Annex 1 of that Report; to 12,700 in the Proposed Changes to 12,749 in BNES/48; to 12,956 in CSA6 (paragraph 1.26b) of the Schedule of CS Amendments (which should be 12,936 unless the affordable housing figure is meant to be 3,310 rather than 3,290); and to ‘around 13,000 homes’ in Policy DW1 (CSA14). However the more significant change is what seems to be an attempt to present the headline figure of 12,956 (or 12,936) or ‘around 13,000’ as an estimate of housing land supply in Table 1B of CSA6, rather than a requirement on the demand side of the equation, as explained in the earlier documentation.

This change of ‘interpretation’ appears to be a sleight of hand to avoid assessing 5-year housing land requirements on the basis of the headline figure for total housing requirements. It requires far more explanation and justification than is presented in CSA6 or BNES/52, which was promised to provide further explanation but is not at all clear.

There are several errors in BNES/52 that make it difficult to follow, including 2.1, 3.34, the following table and Table A2ii (not including spelling errors that we consider to be de minimis). Having ‘read with precision the construction of NPPF paragraph 157’ we are unable to see how it supports a ‘more refined approach’ to housing land supply based on disaggregating market and affordable housing. It is misleading to separate the requirements for market and affordable housing when the delivery of most affordable housing is dependent on planning obligations linked to market housing.

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The SHMA for Bath and North East Somerset (with its addenda) does not fulfil the requirements of the NPPF (paragraph 158), the DCLG Practice Guidance of March 2007 or the draft NPPG.

The Council’s reasoning about the need for additional market housing to deliver the required quantum of affordable housing is full of contradictions. If the additional housing is justified and capable of delivery, it must be part of the planning requirement and must form the basis for calculating the 5 year housing land supply with the addition of the backlog and a buffer as stated in ID/40, paragraph 13 – 15.

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**Change to the policy requested:**

Tables 1A and 1B in paragraph 1.26 should be revised to show a full objective assessment of housing requirements to meet market and affordable housing needs. The basis for Table 1B should be explained in term of housing requirements and not labelled, confusingly, housing land supply. It should also be consistent with the terminology used in Policy DW1 (CSA14) The total in Table 1B should be consistent with its component parts (which may mean correcting the affordable housing figure).

**Respondent Number:** 219 **Comment Number:** 3 **Respondent Name:** Edward Ware Homes Limited **Respondent Organisation:**

**Agent ID:** 165 **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The Council has not 'undertaken an assessment of the needs of development within the District during the plan period' as described in CSA3 (paragraph 1.19a) to comply with paragraph 47 of the NPPF. An objection is therefore made to the Council's assessment of needs within the district during the plan period, which is reported as assessing the space needed for economic growth, housing, retail provision and social needs whilst also taking into account the Council's objective of promoting 'a higher value economy rather than only volume growth.'

The geography of the SHMA was discussed at the Hearing session on 17th September and there remain significant issues about the reliance that can be placed on the SHMA, as amended by Addenda 1a to 1c, which have been addressed in Statements for the Hearing sessions on 10th and 11th December.

Even if it is accepted that a SHMA can be prepared for just the District, it is still necessary to consider the implications of housing needs of neighbouring areas and especially Bristol, which have not been fully considered (contrary to the assertion in paragraph 1.18).

**Change to the policy requested:**

A more robust assessment is required of future housing requirements, recognising the underlying demographic, social and economic forces for change, based on a long-term view of trends in migration, household formation and economic activity and taking account of the impacts of housing demand in adjoining districts – in particular Bristol.

**Respondent Number:** 224 **Comment Number:** 1 **Respondent Name:** Caroline Kay

**Respondent Organisation:** Bath Preservation Trust

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Comment on Alternative Options

**Comment made on the Proposed Change:**

**Support:**

While Bath Preservation Trust does not expect to appear at the hearing on 10-11 December, and we fully understand the clarification made by the Inspector in para 3.35 of ID42, I am making the following submission on the Trust's behalf which relates inter alia to question 3.33 of ID42.

3.33 The Council has increased the housing requirement from its assessment of objective need/demand plus local plan backlog in order to deliver the additional affordable housing needed. On what basis does the Council consider that this additional market-led housing will be delivered, given that it is more than its assessment of need/demand?

1. We note that housing calculations are not easy for lay audiences (who make up the majority affected by planning decisions) fully to understand. The publication of the proposed amendments to the Core Strategy on 11 November 2013 (in particular CSA14) combined a restatement of the housing figures with delineation of green belt sites for housing. This has drawn to the attention of wider audiences, for the first time in an understandable way not buried in supporting evidence documents, that the B&NES housing need, in the case of market housing, is expected to be well exceeded in the trajectory of the Core Strategy, and that B&NES proposes to deliver considerably in excess of their required target of market houses in order to 'facilitate' the supply of affordable housing which otherwise risks falling short of target. It is to achieve this aim that B&NES proposes to build in the Green Belt.

2. The Council's calculations are based on the actual % of affordable housing planned on sites already with permission, together with an assumption that they can deliver their target % (either 30% or 40% affordable depending on site, but no more) on future sites. The figures are set out clearly in an email received by me from a B&NES officer on request for clarification, the content of which is appended to this submission.

3. The Council presumably had a choice as to whether provision of land supply in the Green Belt and AONB for this excess market housing was appropriate, or whether on the other hand they could find other ways to increase the affordable provision on land not yet agreed or developed. We are not aware of any indication that they considered other options than releasing green belt land though we accept there may be some in the supporting evidence which we have not yet identified.

4. The Inspector's question relates to whether the market housing is likely to be delivered since it is in excess of need. As we have argued elsewhere, demand for market housing in Bath is always high because of its perceived attractiveness for second home owners, holiday lets and buy-to-let investment, little of which serves housing need. This in turn pushes up land values which then leads developers to present a case that the imposition of significant affordable housing percentages renders sites to be uncommercial.

5. The Inspector will no doubt hear from developers' representatives who wish to exploit the demand for market housing in Bath by arguing that still more market houses should be built, above assessed need and even above B&NES' own figures. It is in their interests to argue that the affordable percentages are unlikely to be delivered given Bath's land values, because the consequence would be to insist that yet more land is released for market housing, for which there is an economic demand unrelated to actual housing need or jobs provision. But such development is not in the interest of appropriate planned development for Bath.

6. We would answer the Inspector's question therefore that the market housing is likely to be delivered but question, in turn, whether an over-provision of market housing on expensive land is the best way to guarantee provision of affordable housing, and (at the next stage of the examination) whether releasing Green Belt for this excess market housing is justifiable.

7. We would argue that the decision to overprovide market housing is not the only or the most effective or responsible way to deliver the affordable targets. B&NES is obliged to consider such alternatives under NPPF 116, for example:

- Finding land to provide 100% affordable developments, possibly using some of B&NES own city centre (and therefore highly sustainable) property portfolio to supply suitable sites.
- Requiring land owners to accept higher affordable percentages than 35 to 40%; and certainly not permitting any more development at under this percentage; if necessary by reducing other S106 contribution requirements.
- Increasing the lower densities that are proposed for the brownfield sites in Bath.
- Encouraging the use of and facilitating the conversion of the large number of empty flats that exist above shops in Bath, often in B&NES own property portfolio.
- Approaching neighbouring towns in West Wiltshire that have good rail travel links into Bath and which already form part of Bath's commuter area to see if they can help with sites and therefore giving meaning to the duty to cooperate in relation to Wiltshire, which is not part of the West of England Partnership and therefore risks being excluded from the 2016 review.

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8.If the Inspector is minded to insist that yet more market housing over and above need is required for Bath to deliver affordable targets, we would request that he consider the distorted nature of the Bath housing market and whether or not encouraging its growth beyond market need represents truly plan-led development. If the SHMA target is raised beyond the 8727, B&NES has no incentive to consider these other options for meeting the challenge of their affordable targets.

9.At the subsequent hearings of the Examination we will seek to argue that the harm caused by the allocation of green belt land, largely for the provision of excess market housing, outweighs the benefits delivered, for reasons relating to the purposes of the Green belt, AONB and World Heritage Site setting. At this stage we simply want to put a marker down that we question the that additional market housing is the only means of securing the affordable housing shortfall, which in turn increases the housing delivery requirement to numbers far in excess of the objectively assessed need.

**Change to the policy requested:**

**Respondent Number:** 244  
**Comment Number:** 2  
**Respondent Name:**  
**Agent ID:**  
**Agent Name:**

**Respondent Organisation:** HBF - Home Builders Federation

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The Spatial Distribution of Housing across the District is set out in Table 1C. However since the SHMA does not look at local sub housing markets within BANES District there is a limited evidence base supporting the proposed distribution. Moreover as the BANES District only based SHMA ignores the inter-relationship between BANES and its neighbouring authorities, this is a significant weakness in the Council's evidence.

**Change to the policy requested:**

**Respondent Number:** 244  
**Comment Number:** 3  
**Respondent Name:**  
**Agent ID:**  
**Agent Name:**

**Respondent Organisation:** HBF - Home Builders Federation

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

With regards to the proposed amendments on the strategic sites, it would be necessary to whole plan viability test the Place-making Principle proposals. As previously discussed in our May 2013 consultation response, the BANES Council Viability Study Update dated December 2012 by Andrew Golland Associates does not provide a robust viability assessment. The Council should also be mindful of any implications arising from the Government's recent consultations on "Housing Standards Review" and "Next Steps to Zero Carbon Homes – Allowable Solutions" and the Written Ministerial Statement on changes to requirements under Part L of the Building Regulations (conservation of fuel and power) issued on 30th July 2013 in respect of proposals in the Place-making Principles.

Change to the policy requested:

**Respondent Number:** 244 **Comment Number:** 1 **Respondent Name:** **Respondent Organisation:** HBF - Home Builders Federation

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

Support:

The on-going examination of the BANES Core Strategy is a prolonged and confusing matter. The proposed changes to the submitted CS, which are the subject of this consultation, represent the Council's latest response to resolving concerns raised by the Inspector and other interested parties on housing numbers, strategic sites and the review of Green Belt boundaries.

In the previous consultation on proposed Modifications undertaken in May 2013, the Council proposed the following modifications:-

- Modification SPC14 to Paragraph 1.26 "The Core Strategy makes provision for around 12,700 new homes and around 10,170 new jobs".
- Modification SPC23 to Policy DW1 Clause 2 "Making provision for a net increase of 10,170 jobs and 12,700 homes between 2011 and 2029, of which around 3,110 affordable homes will be delivered through the planning system".

In the latest proposed amendments under Change Reference CSA6 the Council makes the following changes:-

- "1.26a.The objectively assessed need for housing and the requirements of the plan are 8,727 dwellings which includes 5,437 market homes and 3,290 affordable homes (Table 1A below). It is these figures against which the implementation of the plan will be monitored. A five year land supply of specific deliverable sites will be maintained against this disaggregated District-wide requirement for both market and affordable housing. In order to meet the economic growth aspirations, the strategy also needs to enable the delivery of around 10,300 new jobs."
- "1.26b.The supply of market and total housing that will be delivered (See Table 1B) is significantly greater than objectively assessed requirements. This is because the supply of market housing has been boosted to enable the delivery of the total affordable housing requirement".
- "1.26c.This does not mean that all 12,950 homes are needed to deliver all 3,290 affordable homes. Much of the supply of market housing is on sites that will not yield any affordable housing, This reinforces the justification for identifying a 5 year land supply of specific deliverable sites against the disaggregated requirements for market and affordable housing".

Under Change Reference CSA14 to Policy DW1 District Wide Spatial Strategy 2b and 2c the following amendments are proposed :-

- "the objectively assessed requirements for homes, including affordable homes, for the Plan period (2011 to 2029), as set out in the table below; and

	Total Housing Requirement
Market housing	5,437
Affordable housing	3,290
Total housing	8,727

- an increase in the total housing supply to around 13,000 homes to enable the delivery of the affordable housing requirement".

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The figure of 8,727 dwellings (485 dwellings per annum) of which 5,437 (302 dwellings per annum) and 3,290 dwellings (183 dwellings per annum) is not accepted as an objective assessment of housing needs and a resultant housing requirement for BANES. At the Examination Hearings on 10th and 11th December 2013, alternative housing requirement figures were presented including 14,760 dwellings (820 dwellings per annum) from Gladman's, 15,461 dwellings (859 dwellings per annum) from Savills, 18,000 dwellings (1,000 dwellings per annum) to 20,000 dwellings (1,111 dwellings per annum) from Barton Wilmore and Pegasus. Therefore the Council's calculation of

objectively assessed needs, which in Table 1A is expressed as a Total Housing Requirement, represents only 59%, 56%, 48% or 43% respectively of alternative calculations of objectively assessed needs and resultant housing requirements undertaken by other interested parties.

The assumptions used in the Council's calculations are disputed as previously set out in our written submission to the May 2013 Proposed Modifications consultation, our written Examination Hearing Statements for the Hearings held on 17th September, 10th and 11th December 2013 and the Statement of Common Ground submitted prior to the December Hearings.

As discussed during the 10th and 11th December Examination Hearings there are fundamental flaws in the Council's assumptions, which undermine the soundness of the Core Strategy. The housing requirement has been suppressed by assumptions on past migration trends, an over reliance on 2011-based data, the exclusion of growth in the student population, no consideration of the housing needs of 20% of population not within the self-contained Borough only SHMA, the reduced formation of households during the economic recession and the effect of a constrained housing supply on affordability. Therefore the Council's evidence is an inappropriate basis for the calculation of an objective assessment of housing need.

As stated by the Inspector in Paragraph 1.12 of ID/28 "suppressing housing provision below actual demand may mean that local people in need of a home lose out to wealthier in-migrants".

There is also concern that this very low housing requirement will not support economic growth aspirations. The assumptions used in the Council's modelling on economic participation rates of older people and female population combined with a potential mismatch between the skills of this workforce and the type of employment available are questionable.

Although the possibility of increasing the housing requirement figure was discussed during the December Examination Hearings any increase in dwellings added onto the figure of 8,727 dwellings has no impact because the increase is absorbed into the alleged over supply of market housing set out in Clause 1.26b.

The housing land supply figure proposed by the Council is actually closer to a realistic housing requirement figure for BANES. However even this figure remains below the housing requirement identified by other parties. There is no doubt that this housing supply figure is achievable provided sufficient deliverable sites are available because the housing land supply figure is more representative of the actual housing requirement in BANES than the figure of 8,727 dwellings for the reasons set out above.

As previously stated in our representations the calculation of the 5 year housing land supply should be based on the total housing requirement rather than on a disaggregated basis proposed by the Council under Change Reference CSA6. It is understood that this matter will be discussed in further detail in the Examination Hearing sessions.

The Spatial Distribution of Housing across the District is set out in Table 1C. However since the SHMA does not look at local sub housing markets within BANES District there is a limited evidence base supporting the proposed distribution. Moreover as the BANES District only based SHMA ignores the inter-relationship between BANES and its neighbouring authorities, this is a significant weakness in the Council's evidence.

### Change to the policy requested:

Finally under Change Reference CSA14 Policy DW1 Clause 9 and Change Reference CSA53 Paragraphs 7.05 – 7.05d, the Council sets out proposals for future reviews of the Core Strategy. An early review mechanism is an inappropriate remedy for an unsound plan. The proposed policy change in Policy DW1 Clause 9 is insufficient in its commitment to an early review to align with the review of neighbouring authorities Core Strategies and the work of the LEP on West of England SHMA. However it is understood that the appropriate wording for a policy on an early review will be discussed in further detail in the Examination Hearings in 2014.

<b>Respondent Number:</b> 246	<b>Comment Number:</b> 2	<b>Respondent Name:</b>	<b>Respondent Organisation:</b> Combe Hay Parish Council
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>		<b>Attachments sent with the comment?</b> <input type="checkbox"/>	

**Change Reference:** CSA6

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:** Support:   
 Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

**Change to the policy requested:**  
 Reduce the over-provision of Market housing in the Green Belt surrounding Bath.

<b>Respondent Number:</b> 248	<b>Comment Number:</b> 4	<b>Respondent Name:</b>	<b>Respondent Organisation:</b> Crest Strategic Projects
<b>Agent ID:</b> 30	<b>Agent Name:</b> RPS Planning & Development		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>		<b>Attachments sent with the comment?</b> <input type="checkbox"/>	

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:** Support:

CSA6/CSA14

1) RPS objects to the manner in which the housing requirement is presented:

- RPS objects to the overall number and methodology for its calculation. These matters have been rehearsed at examination on 11/12 December.
- RPS does not accept the disaggregated approach to splitting the requirement between market and affordable homes.
- RPS does not accept that the five year requirement can be based on the 8,727 figure as opposed to the 12,956.

2) The whole approach is contrived so that the Council can demonstrate a five year supply of land at point of adoption of the plan.

3) Paragraph 1.26b states that the supply of market homes has been boosted to enable the delivery of the affordable housing requirement. The NPPF requires that the CS meets the FULL objectively assessed needs for market and affordable housing in the housing market area. The supply of homes cannot simply be boosted if the market does exist. B&NES must consider that it does otherwise the objectives of the CS cannot be fulfilled. If that is the case, then the number to test the five year supply is 12,956; it cannot be anything else. If B&NES does not consider that the market can support the delivery of 12,956 homes then the CS is fundamentally flawed. B&NES cannot adopt an interim position that is neither one thing nor the other.

4) The Inspector had asked the question of the Council what confidence there can be to deliver the 12,956 figure (of which 9,646 homes are market) if B&NES is arguing that the full market demand is 5,437. The response it gave in BNS/52 was unsatisfactory. In his verbal response to the Inspector, Counsel for B&NES stated that the 'other side of the table' had repeatedly expressed confidence regarding the strength of the market and that it can deliver those numbers. He went on to state that in the event the market in B&NES is not performing, because of the 'claimed unmet needs arising from Bristol', the numbers can somehow be fulfilled from that source.

5) The only way the 12,956 figure can be reached is via the unmet needs from Bristol (and other HMAs). B&NES has stated that the full, objectively assessed market demand is 5,437 not 9,646; that is the basis in which this CS is being examined. Counsel cannot reasonably state that the market can support it; if it can then the new requirement is 12,956 with a

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market homes contribution of 9,646.

6) If B&NES and its Counsel wish to maintain the current stance, and that the market will absorb unmet needs from Bristol, then the spatial strategy is fatally flawed. The 4,209 overprovision of market homes should not be directed towards Bath, but Bristol. The CS is unsound as a consequence.

7) The NPPF demands that a five year supply is demonstrated against the housing 'requirement'. The requirement in B&NES, to deliver the aims and objectives of the CS, is 12,956. If it fails to deliver that number then it has failed to meet the affordable housing needs of the District. It can be no other number.

8) It is not clear whether BANES is seeking to split the five year supply requirements/calculations between market and affordable housing. It would be nonsensical to do so, not least from a public scrutiny point of view where the plan is already more complex than it ever needs to be.

9) Whichever way B&NES now turns it will trip itself up. It can either:

- Accept that the requirement is 12,956 and that is the basis for the five year supply calculations, however, it cannot demonstrate a five year supply against this figure and the CS is not sound. This has already been shown to be the case in South Gloucestershire where that LPA could not demonstrate a five year supply at point of adoption of the plan and had to re-consult on additional allocations.
- Maintain the disaggregated approach and that the 5,437 figure will meet the full market needs of B&NES. The uplift of 4,209 to 9,646 will be met from households displaced from other HMAs (most probably Bristol). As such, the spatial strategy is flawed and the duty to cooperate has not been engaged.

**Change to the policy requested:**

Based on the above two scenarios there is now no scope to find the CS sound. Both outcomes require major modifications and there is no longer any context for that given the length of examination and costs incurred to date.

**Respondent Number:** 269    **Comment Number:** 4    **Respondent Name:**    **Respondent Organisation:** Barratt Homes Ltd

**Agent ID:** 174    **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

An objection is made to changes proposed to paragraph 1.26 a – d entitled “the scale and location of growth.” The Council’s approach to housing requirements as now set out in CSA6 appears to be different from the approach taken in the Proposed Changes and explained in the Council report of 4 March and in BNES/48 (undated, but produced in mid September, following the SHMA seminar on 2 August) which purports to explain SHMA Addenda 1a, 1b, and 1c.

There are several relatively insignificant changes in the overall housing figure: from 12,722 in the Council Report of March 2013 or 12,274 to 12,749 in Table 4 of Annex 1 of that Report; to 12,700 in the Proposed Changes to 12,749 in BNES/48; to 12,956 in CSA6 (paragraph 1.26b) of the Schedule of CS Amendments (which should be 12,936 unless the affordable housing figure is meant to be 3,310 rather than 3,290); and to ‘around 13,000 homes’ in Policy DW1 (CSA14).

However the more significant change is what seems to be an attempt to present the headline figure of 12,956 (or 12,936) or ‘around 13,000’ as an estimate of housing land supply in Table 1B of CSA6, rather than a requirement on the demand side of the equation, as explained in the earlier documentation.

This change of ‘interpretation’ appears to be a sleight of hand to avoid assessing 5-year housing land requirements on the basis of the headline figure for total housing requirements. It requires far more explanation and justification than is presented in CSA6 or BNES/52, which was promised to provide further explanation but is not at all clear.

There are several errors in BNES/52 that make it difficult to follow, including 2.1, 3.34, the following table and Table A2ii (not including spelling errors that we consider to be de minimis). Having ‘read with precision the construction of NPPF

paragraph 157' we are unable to see how it supports a 'more refined approach' to housing land supply based on disaggregating market and affordable housing. It is misleading to separate the requirements for market and affordable housing when the delivery of most affordable housing is dependent on planning obligations linked to market housing.

The answers to 3.34 in BNES/52 (p 27ff) confuse requirements and supply; they appear to say that 12,956 is simply a forecast of supply, which fortuitously delivers (exactly) the requirement for affordable housing (3,310) by 'over-supplying' market housing (by 9,646 rather than 5,437). The basis for 12,956 as a supply figure and its relationship to the headline requirement figure included in the Proposed Changes require a full explanation from the Council.

Among the many contradictions that are not explained is how the apparent 'over-supply' of market housing (by 9,646 rather than 5,437) can be delivered – if there is no demand/requirement for this number of market homes. BNES/52 offers 'smoke and mirrors' rather than an explanation for the housing figures in Tables 1A and 1B of CSA6.

The NPPF expects Local Plans to meet the full, objectively assessed needs across their housing market area. Emerging Government Guidance confirms that needs should be assessed first, and independently of possible constraints to meeting them.

The Core Strategy had included a housing requirement of 12,700 dwellings in Policy DW1. This figure is proposed to be replaced by a table which sets out that the objectively assessed housing requirement comprises: - market housing 5,437 plus affordable housing 3,290 dwellings giving a total of 8,727 dwellings. The amendment CSA6 states that it is against these figures that the implementation of the plan will be monitored. "A five year land supply of specific deliverable sites will be maintained against this disaggregated District wide requirement for both market and affordable housing...."

The Inspector's note ID 40 at paragraphs 14 and 15 clearly states that the housing land supply should be assessed against the housing requirement in the Plan i.e. 12,700 dwellings.

Paragraph 14 states that:

"NPPF paragraph 47 refers to identifying sufficient deliverable sites to provide 5 years' worth of housing against the housing requirement, plus an appropriate buffer. In my view, the housing requirement is the requirement that has been (or, in this case, is proposed to be) identified in a Council's up-to-date, adopted development plan. It is the scale of housing that the Council is proposing to deliver."

Paragraph 15 states that:

"... the council's approach is not justified. It seeks to calculate the 5 year supply on the basis of the selected household projection (plus front-loaded local plan backlog) rather than the headline requirement which will be set out in the Core Strategy....More importantly the Council has concluded that 12,700 new homes are necessary and should be delivered over the plan period. This is what the council is promising to do and therefore this is the figure against which its delivery should be judged in calculating the 5 year supply."

BNES 51 states that the Council has proposed amendments to Policy DW1 but the full explanation of this "will be more helpfully set out as part of the Council's broader response to ID/42." In other words the justification will not be available until the Council have prepared and submitted their Hearing Statements on 22nd November. BNES 52 which responds to the Inspector's questions in ID/42 was published after 22nd November during the consultation period on the Core Strategy Schedule of Amendments.

The objective assessment of housing need now only indicates a figure of 8,727 dwellings for the plan period when previously the figure included in the plan was 8,637 dwellings (source: BANES 48 paragraph 20) The justification for this appears to be based on the revised SHMA and sensitivity testing. Pegasus Group have commented on this and prepared a Hearing Statement for the examination sessions on 10th and 11th December. Without repeating our Hearing Statement, in summary we object to the revised housing provision as proposed in the Schedule of Core Strategy Amendments November 2013.

Whilst the SHMA has been revised since the Core Strategy Proposed Changes was produced and considered by the Council on 4th March, it is widely accepted and also evident in various documents produced by the Council that there has been an undersupply of housing and that there is a significant affordability issues in BANES, (Proposed Change CSA 3 to new paragraph 1.19b states that in terms of affordable housing need, Bath has one of the widest house price to earnings ratios

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outside of London and affordability varies across the district.)

National guidance states that, “the assessment will need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.”

The SHMA for Bath and North East Somerset (with its addenda) does not fulfil the requirements of the NPPF (paragraph 158), the DCLG Practice Guidance of March 2007 or the draft NPPG.

The Council’s reasoning about the need for additional market housing to deliver the required quantum of affordable housing is full of contradictions. If the additional housing is justified and capable of delivery, it must be part of the planning requirement and must form the basis for calculating the 5 year housing land supply with the addition of the backlog and a buffer as stated in ID/40, paragraph 13 – 15.

There is no justification for a disaggregated district wide housing requirement for both market and affordable housing, the concept is fraught with difficulties in terms of transparency and monitoring. The plan seems to be contradictory stating that the supply of market housing has been boosted to enable the delivery of the total affordable housing requirement. However, the next paragraph 1.26c states that “much of the supply of market housing is on sites that will not yield any affordable housing” so in order to attempt to monitor the supply of housing the Council have devised this disaggregated requirement, however, in practice it is not clear how the delivery of affordable housing will be monitored.

Table 1A Housing Requirement has a figure for affordable housing of 3,290 dwellings this also happens to the same figure in Table 1B Housing Land Supply.

Table 9 ‘Meeting the need for market and affordable housing’ in BNES 48 explains how the total of 12,749 dwellings is calculated but this table should be reproduced to show how latest figures in the plan in paragraph 1.26a – d area calculated (Change ref CSA6 in the Schedule of Core Strategy Amendments Nov 2013). Table 9 the figure for total housing is 8,637 which is from Table 2c based on Draft SHMA adjusted 2008 headship rates low trend migration. The figure for affordable housing is from Table 8 Draft SHMA adjusted 2008 headship rates low trend migration. (However, BNES 48 paragraph 34 refers to 3,110 affordable units plus a further 90 units), therefore should the total be 3,200 affordable in Table 1A of the Schedule of Core Strategy Amendments Nov 2013.

**Change to the policy requested:**

Tables 1A and 1B in paragraph 1.26 should be revised to show a full objective assessment of housing requirements to meet market and affordable housing needs. The basis for Table 1B should be explained in term of housing requirements and not labelled, confusingly, housing land supply. It should also be consistent with the terminology used in Policy DW1 (CSA14) The total in Table 1B should be consistent with its component parts (which may mean correcting the affordable housing figure).

**Respondent Number:** 269  
**Comment Number:** 3  
**Agent ID:** 174  
**Agent Name:** Pegasus Planning Group

**Respondent Organisation:** Barratt Homes Ltd

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

Support:

The Council has not ‘undertaken an assessment of the needs of development within the District during the plan period’ as described in CSA3 (paragraph 1.19a) to comply with paragraph 47 of the NPPF. An objection is therefore made to the Council’s assessment of needs within the district during the plan period, which is reported as assessing the space needed for economic growth, housing, retail provision and social needs whilst also taking into account the Council’s objective of promoting ‘a higher value economy rather than only volume growth.’

The geography of the SHMA was discussed at the Hearing session on 17th September and there remain significant issues about the reliance that can be placed on the SHMA, as amended by Addenda 1a to 1c, which have been addressed in

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Statements for the Hearing sessions on 10th and 11th December.

Even if it is accepted that a SHMA can be prepared for just the District, it is still necessary to consider the implications of housing needs of neighbouring areas and especially Bristol, which have not been fully considered (contrary to the assertion in paragraph 1.18).

### Change to the policy requested:

A more robust assessment is required of future housing requirements, recognising the underlying demographic, social and economic forces for change, based on a long-term view of trends in migration, household formation and economic activity and taking account of the impacts of housing demand in adjoining districts – in particular Bristol.

**Respondent Number:** 276 **Comment Number:** 4 **Respondent Name:** Mr Charles Hignett

**Respondent Organisation:** Hignett Family Trust

**Agent ID:** 123 **Agent Name:** Savills (L&P)

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Land adjoining Odd Down

### Comment made on the Proposed Change:

**Support:**

Proposed Change CSA53 is intended to strengthen the mechanism proposed for the review of the Core Strategy. Whilst we welcome such a change in principle we do not consider that the change goes far enough in committing the Council to a timetable for the Core Strategy review in line with the West of England SHMA.

Paragraph 157 of The NPPF requires that “Local Plans should: ... be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;”

The West of England SHMA will provide important, up to date evidence which reflects the needs of the wider area. The Council should in our view incorporate into Core Strategy a timetable for the review based upon the proposed publication date for the West of England SHMA. This would give all those with an interest in strategic planning in B&NES a clear understanding of the Council’s plans to respond to the more recent, up to date evidence of housing need and ensure consistency with the NPPF.

### Change to the policy requested:

Incorporate a timetable for the review of the Core Strategy based upon the proposed publication date for the West of England SHMA.

**Respondent Number:** 276 **Comment Number:** 2 **Respondent Name:** Mr Charles Hignett

**Respondent Organisation:** Hignett Family Trust

**Agent ID:** 123 **Agent Name:** Savills (L&P)

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Land adjoining Odd Down

### Comment made on the Proposed Change:

**Support:**

Proposed Changes CSA6 and CSA54 reflect the Council’s approach to the objectively assessed housing need and the housing land supply position.

For the reasons set out in our previous Representations and Position Statement for the Examination Session on 10 – 11 December 2013, we do not support the Council’s assessment of the objectively assessed needs. We do not reiterate this evidence within these Representations or the assessment of the housing requirement which we support as an alternative to that within the Core Strategy. We trust these will be taken into consideration by the Inspector alongside any additional

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submissions in relation to the overall strategic housing requirement and the assessment of market and affordable housing need. Putting to one side the evidence submitted in support of a higher housing requirement, we do not consider the 'disaggregated approach' is either justified or practicable.

It is our view that the market signals relating to matters such as house price increases and worsening affordability etc, strongly indicate that there is a substantial need for housing over and above the level derived from a forward projection of past (suppressed) population and household projections. Indeed, the significant need for affordable housing is, in itself, a strong indicator of the need to increase overall housing land supply. It is our view therefore that the housing requirement should be considered in the round and, whatever figure is selected, this should represent the basis for calculating the five year housing land supply.

Notwithstanding the principles of this approach, in practice it would be very difficult to accurately project a disaggregated assessment of market and affordable housing into the next five years in order to determine whether there was a sufficient housing land supply to accord with the requirements of the NPPF.

It is complex enough as it is for local planning authorities, applicants and, on appeal, inspectors, to establish with any degree of accuracy whether a five year housing land supply exists. This will be made significantly more complicated under the disaggregated approach. Indeed, it would be necessary to estimate not only whether a site which does not as yet have planning permission will come forward, but also the split between market and affordable housing, whether there are any viability constraints which may lead to a reductions in the proportion of affordable housing, and how the development will be phased to deliver the estimated mix of housing tenures. Any calculation based on such a number of uncertain variables is fraught with difficulty and subject to huge uncertainty.

Notwithstanding the objections we have to both the overall housing requirement and the principle of the 'disaggregated approach', we do not consider this to be a practical approach to assessing a fundamental component of the NPPF.

### Change to the policy requested:

The disaggregated approach should be replaced with a fixed housing requirement and the calculation of the five year housing land supply should be based upon the fixed requirement

**Respondent Number:** 276 **Comment Number:** 6 **Respondent Name:** Mr Charles Hignett

**Respondent Organisation:** Hignett Family Trust

**Agent ID:** 151 **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Land adjoining Odd Down

### Comment made on the Proposed Change:

Support:

The scale of the housing in Bath should be increased to take account of the available capacity at Odd Down ( Arup Report April 2013). Consequently the capacity at Keynsham and at Whitchurch Green Belt should be reduced to take account of the increased capacity at Odd Down.

As an alternative , the Council may wish to maintain these other locations and their capacity in order to boost supply and to provide flexibility and choice of homes including affordable housing ( NPPF) including maintaining an adequate supply of suitable housing ie a 5 Year Supply + 20% throughout the period of the Plan. To maintain this additional capacity for delivery will require provision of capacity not addressed in the Plan.

### Change to the policy requested:

So the Council should increase the housing capacity at Bath to reflect the additional capacity at Odd Down and either reduce capacity at other locations or retain them, in order to boost supply.

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**Respondent Number:** 837  
**Comment Number:** 16  
**Respondent Name:** David Redgewell  
**Agent ID:**  
**Agent Name:**

**Respondent Organisation:** South West Transport  
Network Railfuture TFGB

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Across all policies and especially housing there is a shortage of affordable disabled housing in the district within the 30-/ affordability the plan is not clear on access to public transport systems.

Keynsham Station disabled ramp access and safety issues CCTV at Keynsham and Oldfield Park stations or low floor buses within the Bath area transport plan or the Bath / Bristol city region. Western Wiltshire / Mendip district of Somerset bus network.

Wards need strengthening on the public Equalities Duty. Low floor access single decker 2014 2015, 2016 large single deckers 2017 double deckers.

**Change to the policy requested:**

**Respondent Number:** 837  
**Comment Number:** 12  
**Respondent Name:** David Redgewell  
**Agent ID:**  
**Agent Name:**

**Respondent Organisation:** South West Transport  
Network Railfuture

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

BANES is still failing to build enough affordable and rented houses to meet its waiting list of 4000 – 5000 people. More land needs allocating in line with government policy on land supply 5 year National Planning Policy framework.

**Change to the policy requested:**

We would like to see South West Keynsham allocated included Lays Farm as good public transport links could be developed using Keynsham Station to Whitchurch New Estate Village and hospital site in South Bristol close to jobs and employment and bus services to Bath city centre and Bristol.

**Respondent Number:** 837  
**Comment Number:** 15  
**Respondent Name:** David Redgewell  
**Agent ID:**  
**Agent Name:**

**Respondent Organisation:** South West Transport  
Network Railfuture

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Travellers site also needs protecting in the area with enough pitches.

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Housing allocation needs to be addressed towards the Newbridge area in land towards Corston Village with good urban design as a entries towards Bath World Heritage site with good public transport links along the A4 corridor, with bus connections 15 / X39, 338, 339 A4 all operating on this route and new rail station at Saltford. Bath requires in BANES 4000 – 5000 affordable houses on the waiting list to prevent outward community into Mendip District Council Core Strategy and Wiltshire Core Strategy to prevent outward community.

**Change to the policy requested:**

**Respondent Number:** 837 **Comment Number:** 6 **Respondent Name:** David Redgewell **Respondent Organisation:** South Transport TFGB Network / Railfuture  
**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Keynsham, Whitchurch and Bath is failing to allocate enough houses for rent and buy for H workforce and should be reducing outward community.

**Change to the policy requested:**

Extra housing needs to be developed protecting the Green Lung at Hicks Gate around roundabout with the new Avon Area Fire Station and business units. With Keynsham station and bus links every 12 minutes to Bristol to Bath in the day X39, 338, 339, 178 and 349 and hourly at night, 1 hourly overnight.

**Respondent Number:** 1206 **Comment Number:** 1 **Respondent Name:**

**Respondent Organisation:** Freshford Parish Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** No comment on Strategic Sites

**Comment made on the Proposed Change:**

**Support:**

This amendment sets out housing numbers and the relationship between market and affordable housing.

Para 1.26a states “The objectively assessed need for housing and the requirements of the plan are 8,727 dwellings which includes 5,437 market homes and 3,290 affordable homes” (shown in Table 1A).

However, Para 1.26b goes on to say “The supply of market and total housing that will be delivered [market housing 9,646; affordable housing still 3,290 giving a total of 12,956] (See Table 1B) is significantly greater than objectively assessed requirements. This is because the supply of market housing has been boosted to enable the delivery of the total affordable housing requirement.”

And Para 1.26c goes on to state that “This does not mean that all 12,956 homes are needed to deliver all 3,290 affordable homes. Much of the supply of market housing is on sites that will not yield any affordable housing. This reinforces the justification for identifying a 5 year land supply of specific deliverable sites against the disaggregated requirements for market and affordable housing”.

Three comments/questions:

How robust are any of these figures, given the wide range of numbers for housing needs mentioned during the hearing

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before the Inspector on 10th and 11th December?

With what confidence is the enhanced market housing figure seen as sufficient to ensure that the required number of affordable houses are built. The market/affordable ratio referred to in Para 1.26b is approximately 3:1. None of the developers at the December hearing agreed that 3:1 was high enough.

Why is consideration not being given to affordable housing on sites which qualify as Rural Exception sites? Para 54 of the NPPF provides for affordable housing on such sites.

**Change to the policy requested:**

The policy should refer to the use of Rural Exception Sites as an additional means of providing affordable housing.

**Respondent Number:** 1525 **Comment Number:** 6 **Respondent Name:** Robert Hellard

**Respondent Organisation:** South Stoke Parish Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

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

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

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

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

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

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

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

**Change to the policy requested:**

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**Respondent Number:** 2012 **Comment Number:** 1 **Respondent Name:** Steven Gourley

**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The Core Strategy plan is fundamentally unsound. These amendments would sacrifice Green Belt and AONB land without justification. This can't be considered sustainable.

The total housing to be delivered is over 4,000 units more than the forecast requirement. This is to encourage private developers to build an additional 1,436 affordable houses. However, if the forecast can be justified then this surplus represents a fundamental weakness for several reasons:

1. If demand is satisfied after, say, 9000 houses are built then developers will build no more – we've seen that in recent years. In this case, the affordable housing target will be missed.
2. If more homes are built than are needed then they will lie empty or be sold at reduced prices. In effect, all such homes could be considered "affordable". Therefore an equally defensible total housing delivery target could be 10,163 (8,727 + 1,436). This would not require any building in the Green Belt.
3. If the additional 4,000 units are built and somehow sold, then it is unclear where the 4-6000 jobs to support those additional households will come from. B&NES don't appear to have allowed for the creation of the capacity to provide this number of jobs in their strategy. Does that mean Bath will become a dormitory town? Is the infrastructure to Bristol/Swindon adequate to support the additional volume of commuters?

In any case, it appears that Green Belt will be among the first land to be built on due to the need to build increased numbers of houses early in the period of the plan and the ease with which they can be built on greenfield sites. Effectively, we are squandering the Green Belt for inadequate reason.

Clearly affordable housing needs to be built. But B&NES have not justified the strategy's reliance solely on private developers to deliver the affordable housing. Surely, rather than building more than forecast requirements, B&NES should investigate other ways of delivering 1,436 affordable houses: for example, by taking advantage of the current relaxation of change of use regulations to turn empty offices in Bath into affordable homes that can be delivered early in the plan; or by increasing the density of affordable homes on Curo-owned sites.

**Change to the policy requested:**

There is either an arithmetic or typing error in Table 1B. Should the total be 12,936? Or is the "Market housing" number wrong? This, at the very least, should be corrected.

The total housing delivery number should be considerably lower. If this is the case then all proposals for development in the Green Belt and AONB could be removed from the plan.

**Respondent Number:** 2564 **Comment Number:** 3 **Respondent Name:**

**Respondent Organisation:** Strategic Land Partnerships

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

1.The following representation to the Schedule of Core Strategy Amendments (Nov 2013) are made on behalf of Strategic Land Partnerships and relate primarily to the identification of sites within the Somer Valley.

## The Changing Role of the Core Strategy

2. There are a number of fundamental problems with the plan as it stands, one of which arises as a direct result of the Inspector's decision to continue on the basis that the geographical extent of the SHMA for BANES district is a suitable proxy for the real Housing Market Area. The reason given for this decision is that the 'Bath HMA within BANES district covers about 80% of the population of the district, it is a reasonable fit to regard the district as a single HMA for the purposes of producing a SHMA and that this approach is NPPF compliant'. The consequence of this decision must be that the provision the Council is making in its plan is as a response to the need identified by the SHMA, and is therefore housing provision for the part of the greater functional area that is covered by the HMA examined in the SHMA. All of the requirements identified should be met in the area where it arises, if at all possible as the Framework advises, and in this case that is possible. The development requirement should be met in locations that directly meet the needs of the residents of BANES, which effectively means that more development should be distributed to Bath, Keynsham and the Somer Valley because this is the area where the need that the Council has assessed is arising.

3. There should not be any significant development on the edge of Bristol to meet the requirement arising from the examination of the Bath HMA as the Council has undertaken. The development proposed in the current plan should be directed instead to Bath, Keynsham and the Somer Valley. There is a need for development on the edge of Bristol, but this requirement arises from a separate assessment of the requirement arising from the city of Bristol that cannot be met within the administrative area of Bristol. It is entirely evident that this need exists and that ignoring it means that the BANES Core Strategy cannot comply with Framework (notwithstanding the legal view reached over the application of the legal duty to cooperate). Any provision to meet that need would be over and above the provision already made in the plan and which would be made if the assessment even on the current basis was properly done. Amendment CSA2), particularly in relation to the 'justified' test of soundness because it is not clear that it is 'the most appropriate strategy when considered against reasonable alternatives'.

4. We are also concerned that there is no recognition within the amendments of the relationship between BANES and Mendip and Wiltshire in relation to some of the smaller towns, particularly in relation to Midsomer Norton. This settlement is now effectively built up to BANES' southern boundary and expansion in this direction is reliant on delivery within Mendip. The SHLAA recognises that the areas need to be planned together, and states that 'A comprehensive approach to planning and design for the whole area would be essential'. The lack of explicit recognition within the plan and the amendments of the need to cooperate with neighbouring authorities to deliver well planned future growth of Midsomer Norton in particular, is a significant gap and one which further demonstrates that cross boundary issues the Framework requires to be considered have not been properly addressed and have not influenced the plan as they should.

5. The plan is now seeking to identify allocations, effectively bringing forward the work that was to be done in the Placemaking Plan. These amendments mean that the Core Strategy has fundamentally changed its role and is now identifying strategic site allocations. The amendments purport to only relate to their green belt boundaries and the placemaking principles; however while we support the principle of green belt release and allocation, we are very concerned that all relevant alternatives have not been properly and comprehensively assessed. It is essential that the Core Strategy, in promoting strategic sites, has considered all the implications of the alternative options to meet the objectively assessed need. This means understanding all the sites that could be used and delivered to provide for housing and other development needs as well as necessary infrastructure such as schools in sustainable locations. We are very concerned that such a transparent and rigorous process has not been used to inform the allocations. As a consequence we are not convinced that the policy framework for the district 'has been guided by the NPPF' (amendment CSA2), particularly in relation to the 'justified' test of soundness because it is not clear that it is 'the most appropriate strategy when considered against reasonable alternatives'.

6. Change CSA3 makes reference to the new SHLAA and we would also like to make specific comments relating to the SHLAA which have a direct impact on the supply of sites identified by the Council and on the housing delivery figures identified in the changes to the policies.

## The SHLAA

7. The SHLAA has not been done according to a robust methodology. It has not used a developer panel to test assumptions, delivery rates and timescales to inform the trajectory that it relies upon to set out the housing provision figure. Paragraph 1.11 of the SHLAA Findings Report states that 'Whilst no developer panel has been convened during the

preparation of the SHLAA, the findings are open and transparent and enable interested parties to critically review the outputs and relay any observations to the Council for consideration'. Consequently the SHLAA must only be considered as a draft for consideration and consultation; however, this does not appear to be how it is being used. The figures are directly fed into the Core Strategy amendments with no acknowledgement that they need to be tested and there does not appear to be a proper mechanism to comment on the SHLAA and provide comments to the Council. It is surprising, in view of the untested nature of the SHLAA, that no allowances are included within the calculations for the non delivery of sites.

8. We are particularly concerned that the SHLAA includes a number of sites without planning permission and with no proper assessment of their achievability. This is particularly so in terms of the constraints that may exist for these sites, the effect of their existing land use value on a proper viability assessment in accordance with Framework and the Harman Report, and the ability of sites to deliver the assumed number of market and affordable dwellings. We have not considered every site in the SHLAA and trajectory, but consideration of one site which we are very familiar with (the former Focus DIY centre in Midsomer Norton) demonstrates that there is a lack of information provided about their achievability and the constraints that exist. If this paucity of information is replicated across the whole area there must be considerable doubt about the quality of the outputs and concern about their reliability for use within the trajectory to inform the housing supply figures.

#### Amendments

##### CSA6

9. We disagree with the calculation of objectively assessed need and in particular how it will be used as a figure against which the implementation of the plan will be monitored. This is currently being considered and it is indisputable that it will change. The five year land supply of specific deliverable sites should use the target figure which is the objectively assessed housing requirement and included in the plan, ie 12,900 units as currently presented. The alternative disaggregated approach the Council is promoting is not sound and not based on any robust evidence, guidance or good practice. It is merely a contrived mechanism to reduce the five year land supply and thereby reduce the number of houses that will be delivered. Pursuing a five year land supply that is not based on the objectively assessed.

10. If the Council does not consider it can meet the required five year land supply, a properly evidenced phasing mechanism should be set out. The Inspector in his note ID40 is clear that the five year supply 'is the scale of housing that the Council is promising to deliver'. The Inspector is entirely correct in his interpretation of the five year land supply and consequently the Council's approach is not justified. While the issue is being considered at the examination hearings currently, this issue will need to be debated further through the examination, because it is fundamentally linked with the untested SHLAA and the assessment of available sites and the trajectories suggested.

11. The Council, in these amendments, sets out its approach for the first time of how the supply relates to the objectively assessed requirement and makes clear that the supply has been boosted entirely as a result of the total affordable housing requirement. As far as we are aware this is the first time a plan makes this explicit uplift. It is entirely appropriate for the plan to seek to meet the objectively assessed affordable housing need. However, if it is going to do that it needs to be straightforward in what it is doing, and needs to use information on different aspects of housing need consistently, rather than picking and choosing from different pieces of evidence to construct the answer it wants.

12. It is very likely that the scale of affordable need identified in the SHMA is not high enough. On the basis set out in the plan if the level of affordable housing need increases, so too will the provision of market housing required to deliver it. It is also necessary for the plan to recognise that not all the market sites will deliver affordable homes, and to ensure that the calculations are accurately built up from the SHLAA trajectories, which have been tested with developers and therefore considered robust.

#### The Somer Valley

13. In relation to the Somer Valley, the plan only identifies the need for a very limited number of new dwellings in this location up to the end of the plan period. This is predicated on the fact that many sites have already got permission in this location and are identified in the trajectory as likely to come forward. However, many of these sites are in fact not deliverable and will certainly not meet the level of affordable housing required of them. Reliance on the untested SHLAA to inform the trajectory is unprofessional and leads to considerable uncertainty.

14. Midsomer Norton is a key settlement in the South of BANES which requires significant new infrastructure, including a new primary school, to ensure that it can grow sustainably. The opportunity exists to provide this infrastructure and make

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a significant contribution to meeting the affordable housing need by developing strategically to the south of the town and linking this with the site south of Charlton Park that has been granted planning permission. While the Placemaking Plan might be the best vehicle for identifying new sites, it is essential that the context for such development should be established within the Core Strategy. The Somer Valley does not operate as a small and isolated part of the BANES Housing Market Area. In order to properly understand the Somer Valley, how it functions and the opportunities that exist, it is essential that BANES and Mendip work together through the duty to cooperate. Midsomer Norton in particular, as a settlement on the edge of the district, has significant and important relationships and influences that stretch into Mendip. To treat this as an isolated settlement with no consideration of cross boundary issues and opportunities is misguided and fails to respond to how the place functions in practice.

15. Table 1C on page 7 of the Amendments sets out the spatial distribution of housing across the district. These figures appear to have come out of the SHLAA Nov 2013 trajectory, and when subjected to scrutiny are not considered realistic. Our general concerns on the SHLAA are set out above. However, in relation to the Somer Valley the table implies that there are 2470 houses identified for the plan period, of which 600 will be affordable. However, a calculation of the sites on the trajectory to check the arithmetic does not confirm this figure. Instead it would appear that 2427 houses are identified with 570 affordable. These are set out through a mixture of sites with planning permission, SHLAA sites and a small sites windfall allowance.

16. It is noted that most of the sites have the benefit of planning permission and therefore can be afforded a degree of certainty in terms of delivery of both market and affordable units. However, there are 5 sites which do not have permission and which are primarily previously developed sites with constraints and on which delivery is likely to be more difficult. Many of these are employment sites which are essential to be retained to ensure the vibrant economy and sustainability of the town. These doubtful sites include the MSN.9 Welton Packaging Factory which has considerable heritage constraints and associated development costs. Consequently there are reservations about the delivery of the 348 units and particularly the affordable housing assumptions and the achievement of 108 affordable units on these sites. While we have not considered all the individual sites for the rest of the district it is very likely that there are numerical inaccuracies within them and that delivery on many is not certain. Consequently there is considerable doubt about the reliability and quality of the outputs informing the housing supply figures. This means that there is no certainty about the figures and that considerable flexibility should be built in to ensure the full housing need is met. As a result there will be a requirement for further dwellings to come forward within the Somer Valley, and specifically at Midsomer Norton, and this should be recognised within the Core Strategy.

18. The district wide spatial strategy now identifies the objectively assessed need and total housing requirement as 8,727. However, this level of growth will not meet the affordable housing need and the supply is uplifted to 13,000 to enable delivery of the objectively assessed affordable housing. The policy now allocates specific green belt sites for development to meet the objectively assessed affordable housing need.

19. While we support the general strategy of focusing housing in Bath, Keynsham and the Somer Valley we consider that the level of housing requirement identified is lower than the objectively assessed need. The mechanism of uplifting the provision to deliver affordable housing requires achievable and deliverable sites. All of this is being considered by the Inspector and is highly likely to result in an increased level of provision which cannot be met through the current strategy.

**Change to the policy requested:**

**Respondent Number:** 2564    **Comment Number:** 14    **Respondent Name:**    **Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128    **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Comment on multiple Strategic Sites

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**Comment made on the Proposed Change:**

Support:

8. We disagree with the calculation of objectively assessed need and in particular how it will be used as a figure against which the implementation of the plan will be monitored. This is currently being considered and it is indisputable that it will change. The five year land supply of specific deliverable sites should use the target figure which is the objectively assessed housing requirement and included in the plan, ie 12,900 units as currently presented. The alternative disaggregated approach the Council is promoting is not sound and not based on any robust evidence, guidance or good practice. It is merely a contrived mechanism to reduce the five year land supply and thereby reduce the number of houses that will be delivered. Pursuing a five year land supply that is not based on the objectively assessed need, means that the Council will fail to deliver the affordable housing required and which the Council has specifically identified as a key issue in the plan.

9. If the Council does not consider it can meet the required five year land supply, a properly evidenced phasing mechanism should be set out. The Inspector in his note ID40 is clear that the five year supply 'is the scale of housing that the Council is promising to deliver'. The Inspector is entirely correct in his interpretation of the five year land supply and consequently the Council's approach is not justified. While the issue is being considered at the examination hearings currently, this issue will need to be debated further through the examination, because it is fundamentally linked with the untested SHLAA and the assessment of available sites and the trajectories suggested.

10. The Council, in these amendments, sets out its approach for the first time of how the supply relates to the objectively assessed requirement and makes clear that the supply has been boosted entirely as a result of the total affordable housing requirement. As far as we are aware this is the first time a plan makes this explicit uplift. It is entirely appropriate for the plan to seek to meet the objectively assessed affordable housing need. However, if it is going to do that it needs to be straightforward in what it is doing, and needs to use information on different aspects of housing need consistently, rather than picking and choosing from different pieces of evidence to construct the answer it wants.

11. It is very likely that the scale of affordable need identified in the SHMA is not high enough. On the basis set out in the plan if the level of affordable housing need increases, so too will the provision of market housing required to deliver it. It is also necessary for the plan to recognise that not all the market sites will deliver affordable homes, and to ensure that the calculations are accurately built up from the SHLAA trajectories, which have been tested with developers and therefore considered robust.

**Change to the policy requested:**

**Respondent Number:** 2564 **Comment Number:** 7 **Respondent Name:** Peter Brett Associates

**Respondent Organisation:** Strategic Land Partnerships

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**

Support:

9. We disagree with the calculation of objectively assessed need and in particular how it will be used as a figure against which the implementation of the plan will be monitored. This is currently being considered and it is indisputable that it will change. The five year land supply of specific deliverable sites should use the target figure which is the objectively assessed housing requirement and included in the plan, ie 12,900 units as currently presented. The alternative disaggregated approach the Council is promoting is not sound and not based on any robust evidence, guidance or good practice. It is merely a contrived mechanism to reduce the five year land supply and thereby reduce the number of houses that will be delivered. Pursuing a five year land supply that is not based on the objectively assessed need, means that the Council will fail to deliver the affordable housing required and which the Council has specifically identified as a key issue in the plan.

10. If the Council does not consider it can meet the required five year land supply, a properly evidenced phasing mechanism should be set out. The Inspector in his note ID40 is clear that the five year supply 'is the scale of housing that

the Council is promising to deliver'. The Inspector is entirely correct in his interpretation of the five year land supply and consequently the Council's approach is not justified. While the issue is being considered at the examination hearings currently, this issue will need to be debated further through the examination, because it is fundamentally linked with the untested SHLAA and the assessment of available sites and the trajectories suggested.

11. The Council, in these amendments, sets out its approach for the first time of how the supply relates to the objectively assessed requirement and makes clear that the supply has been boosted entirely as a result of the total affordable housing requirement. As far as we are aware this is the first time a plan makes this explicit uplift. It is entirely appropriate for the plan to seek to meet the objectively assessed affordable housing need. However, if it is going to do that it needs to be straightforward in what it is doing, and needs to use information on different aspects of housing need consistently, rather than picking and choosing from different pieces of evidence to construct the answer it wants.

12. It is very likely that the scale of affordable need identified in the SHMA is not high enough. On the basis set out in the plan if the level of affordable housing need increases, so too will the provision of market housing required to deliver it. It is also necessary for the plan to recognise that not all the market sites will deliver affordable homes, and to ensure that the calculations are accurately built up from the SHLAA trajectories, which have been tested with developers and therefore considered robust.

#### The Somer Valley

13. In relation to the Somer Valley, the plan only identifies the need for a very limited number of new dwellings in this location up to the end of the plan period. This is predicated on the fact that many sites have already got permission in this location and are identified in the trajectory as likely to come forward. However, many of these sites are in fact not deliverable and will certainly not meet the level of affordable housing required of them. Reliance on the untested SHLAA to inform the trajectory is unprofessional and leads to considerable uncertainty.

14. Midsomer Norton is a key settlement in the South of BANES which requires significant new infrastructure, including a new primary school, to ensure that it can grow sustainably. The opportunity exists to provide this infrastructure and make a significant contribution to meeting the affordable housing need by developing strategically to the south of the town and linking this with the site south of Charlton Park that has been granted planning permission. While the Placemaking Plan might be the best vehicle for identifying new sites, it is essential that the context for such development should be established within the Core Strategy. The Somer Valley does not operate as a small and isolated part of the BANES Housing Market Area. In order to properly understand the Somer Valley, how it functions and the opportunities that exist, it is essential that BANES and Mendip work together through the duty to cooperate. Midsomer Norton in particular, as a settlement on the edge of the district, has significant and important relationships and influences that stretch into Mendip. To treat this as an isolated settlement with no consideration of cross boundary issues and opportunities is misguided and fails to respond to how the place functions in practice.

15. Table 1C on page 7 of the Amendments sets out the spatial distribution of housing across the district. These figures appear to have come out of the SHLAA Nov 2013 trajectory, and when subjected to scrutiny are not considered realistic. Our general concerns on the SHLAA are set out above. However, in relation to the Somer Valley the table implies that there are 2470 houses identified for the plan period, of which 600 will be affordable. However, a calculation of the sites on the trajectory to check the arithmetic does not confirm this figure. Instead it would appear that 2427 houses are identified with 570 affordable. These are set out through a mixture of sites with planning permission, SHLAA sites and a small sites windfall allowance.

16. It is noted that most of the sites have the benefit of planning permission and therefore can be afforded a degree of certainty in terms of delivery of both market and affordable units. However, there are 5 sites which do not have permission and which are primarily previously developed sites with constraints and on which delivery is likely to be more difficult. Many of these are employment sites which are essential to be retained to ensure the vibrant economy and sustainability of the town. These doubtful sites include the MSN.9 Welton Packaging Factory which has considerable heritage constraints and associated development costs. Consequently there are reservations about the delivery of the 348 units and particularly the affordable housing assumptions and the achievement of 108 affordable units on these sites. While we have not considered all the individual sites for the rest of the district it is very likely that there are numerical inaccuracies within them and that delivery on many is not certain. Consequently there is considerable doubt about the reliability and quality of the outputs informing the housing supply figures. This means that there is no certainty about the figures and that considerable flexibility should be built in to ensure the full housing need is met. As a result there will be a

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requirement for further dwellings to come forward within the Somer Valley, and specifically at Midsomer Norton, and this should be recognised within the Core Strategy.

**Change to the policy requested:**

**Respondent Number:** 2564 **Comment Number:** 20 **Respondent Name:** **Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

Support:

2. We disagree with the calculation of objectively assessed need and in particular how it will be used as a figure against which the implementation of the plan will be monitored. This is currently being considered and it is indisputable that it will change. The five year land supply of specific deliverable sites should use the target figure which is the objectively assessed housing requirement and included in the plan, ie 12,900 units as currently presented. The alternative disaggregated approach the Council is promoting is not sound and not based on any robust evidence, guidance or good practice. It is merely a contrived mechanism to reduce the five year land supply and thereby reduce the number of houses that should be delivered. Pursuing a five year land supply that is not based on the objectively assessed need, means that the Council will fail to deliver the affordable housing required which the Council has specifically identified as a key issue in the plan.

3. If the Council does not consider it can meet the required five year land supply, a properly evidenced phasing mechanism should be set out. The Inspector in his note ID40 is clear that the five year supply 'is the scale of housing that the Council is promising to deliver'. The Inspector is entirely correct in his interpretation of the five year land supply and consequently the Council's approach is not justified. While the issue is being considered at the examination hearings currently, this issue will need to be debated further through the examination, because it is fundamentally linked with the untested SHLAA and the assessment of available sites and the trajectories suggested.

4. The Council, in these amendments, sets out its approach for the first time of how the supply relates to the objectively assessed requirement and makes clear that the supply has been boosted entirely as a result of the total affordable housing requirement. As far as we are aware this is the first time a plan makes this explicit uplift. It is entirely appropriate for the plan to seek to meet the objectively assessed affordable housing need. However, if it is going to do that it needs to be straightforward in what it is doing, and needs to use information on different aspects of housing need consistently, rather than picking and choosing from different pieces of evidence to construct the answer it wants.

5. It is very likely that the scale of affordable need identified in the SHMA is not high enough. On the basis set out in the plan if the level of affordable housing need increases, so too will the provision of market housing required to deliver it. It is also necessary for the plan to recognise that not all the market sites will deliver affordable homes, and to ensure that the calculations are accurately built up from the SHLAA trajectories, which have been tested with developers and therefore considered robust.

**Change to the policy requested:**

**Respondent Number:** 2565 **Comment Number:** 1 **Respondent Name:** Andrew Bolden **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

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1.26b. It is completely wrong to set out to achieve 48.5% more housing than is needed. This is the difference between Table 1A and Table 1B which is 4,229 houses. This is 4,229 houses for which no need has been identified. The target should be to meet the deliver the identified need of 8,727. NPPF anticipates that a buffer may be required but only of 20%. 48.5% is excessive.

It may be that land values will have to adjusted in recognition that planning policy will not be supporting 'market housing' to the extent which developers, land owners and other interested parties may wish. But there is no identified need for 4,229 so to seek to build them is abandon sustainability as a concept. This is directly contrary to NPPF.

Large areas of land, and especially Green Belt and AONB are put at risk, and blighted, by planning for such an over-supply of housing. This gross over-provision is the reason why Green Belt and AONB is being jeopardised. Each and every indication in the Schedule of Suggested Changes of a need to develop on Green belt, in AONB should be struck out.

The wording of 1.26d indicates that some green field land is required and in some instances (i.e. only a proportion of greenfield sites) that release of Green Belt is required. But the planned over-provision is huge at 48.5% so, by reigning this back just a few percent towards the identified requirement would completely do away with the need to encroach on Green Belt around Bath not only at Odd Down (300 dwellings) but also Weston (150 dwellings). There really is no case made for development at either location when the target are so grossly over-inflated.

I re-state my response to the previous May 2013 consultation (in italics) as the current changes fail to address these issues:-

In relation to Green Belt I consider that SPC88 is unsound in relation to NPPF (Clause 83 in particular) in that "Once established, Green Belt boundaries should only be altered in exceptional circumstances". In my opinion "exceptional circumstances" have not been demonstrated in the Core Strategy so SPC88 (CSA6 and other CSA proposal for the need for Green Belt boundary changes) is not consistent with national policy. The only driver seems to be the calculation (estimate) of dwellings considered to be needed for the plan period. Clause 83 refers to Green belt boundaries as "capable of enduring beyond the plan period". Surely that was the principle behind Green belts being set up in the first place.

In relation to development within the AONB I consider that SPC88 (and any CSA references which result in encroachment on the AONB, although only CSA25 actually mentions the AONB) is unsound in relation to NPPF (Clause 115 in particular), "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty". Clause 116 states "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest." As with the Green Belt no "exceptional circumstances" have been demonstrated in the Core Strategy so SPC88 (and CSA proposals which result in loss of AONB) is not consistent with national policy in relation to the AONB. The 'highest status of protection' should mean exactly what it says – development will not be permitted.

**Change to the policy requested:**

The Council should plan to meet the identified housing need as a total as stated in Table 1A

1.26b and 1.26c should be deleted. The plan should be revised to meet the identified need with up to 205 provision as allowed for by NPPF (but no more).

Other Change Refs which provide for development on Green Belt and in AONB would also need to be revised. (e.g. CSA7, CSA14 section 2c – reduce target housing supply from 13,000 to nearer identified need of 8727).

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 3094 **Comment** 2 **Respondent**  
**Number:** **Number:** **Name:****Respondent** Purnell Property  
**Organisation:** Partnership**Agent ID:** 137 **Agent Name:** Savills**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA6**Location:** Comment on Alternative Options**Comment made on the Proposed Change:**Support: **Change to the policy requested:**

That the Core Strategy reflects the potential contribution that can be made by the CCRC site at Paulton.

**Respondent** 3095 **Comment** 1 **Respondent**  
**Number:** **Number:** **Name:****Respondent** CPRE Avonside  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA6**Location:** Comment on multiple Strategic Sites**Comment made on the Proposed Change:**Support: 

Summary

CPRE Avonside objects to the proposals to remove land from Green Belt. We feel that the damage done to the purposes of Green Belt (and to the other designations affecting some sites, including AONB, World heritage Site Setting, SSSI and Scheduled Ancient Monument) outweighs the advantages of removing these sites from Green Belt.

The current draft Core Strategy is based on a flawed assumption, which is that by allocating sites for several thousand more houses than are actually needed, developers will meet the genuine need for affordable housing. There is insufficient evidence to suggest that this is the case.

However, we recognise the need for a Core Strategy to be adopted and the constraints under which B&NES Council is operating in this. We therefore also include a number of detailed improvements which could be made to the current proposals for Green belt development if it happens that, despite the extensive opposition, proposals for Green Belt development are taken forward.

National policy context

NPPF 80 states the purposes of Green Belt:

"80. Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

A recent report by ARUP for B&NES Council found that all of the Green Belt land in the area is performing these functions effectively, and did not identify any areas which could safely be removed from Green Belt without prejudicing the functions of the remaining areas of Green Belt land. The report concluded:

"The fundamental aim of Green Belt policy '...is to prevent urban sprawl by keeping land permanently open' (NPPF, paragraph 79) and an overall conclusion is that all parts of the current Bristol and Bath Green Belt designation contribute

to this aim. Each of the land parcels appraised serve national Green Belt purposes and all serve local purpose 6, which seeks to safeguard the settings of villages and hamlets.” - Bath and North East Somerset Green Belt Review, ARUP, April 2013

4229 more houses than we actually need

From the documents available, we understand that the new Green Belt sites set out in this consultation are not actually required in order to meet housing needs.

The Schedule of Proposed Changes to the Core Strategy states that sites for 12956 homes have been identified, but also states that the objectively identified need for new homes has been assessed as 8727. However, as we understand it, there is not sufficient likelihood of delivering the required number of affordable homes (3290) within the 11856 sites identified by the previous SHLAA; additional sites are therefore required, which, due to the shortage of brownfield sites, have to be found within Green Belt.

We find this situation to be regrettable in the extreme. The implication is that within the 11,856 sites previously identified, it is not possible to deliver 3290 affordable homes, 27.7% of the total. This is despite:

- a planned £10m direct investment in affordable housing (Core Strategy DWI 1);
- the requirement for 30-40% affordable housing within large new developments and 15-20% in smaller developments (Core Strategy CP9);
- and a Rural Exceptions Policy allowing for 100% affordable housing developments in open countryside.

Damage to Green Belt outweighs advantages of mixed sites

We note that BNES/48 states:

“35. To find an additional 90 units (para 34) a further 300 units overall will be needed if all of these are to be delivered wholly via the planning system on large sites on a mixed tenure mixed and not by any additional 100% affordable housing sites or stock tenure transfers whereby housing associations buy market housing and convert to social/affordable rent.”

We remain unconvinced that the case has properly been made that the damage to Green Belt is outweighed by the advantages of delivering affordable homes on mixed sites rather than through 100% affordable housing sites or stock tenure transfers.

Can the market deliver?

We also note that ID/42 states:

“3.33 The Council has increased the housing requirement from its assessment of objective need/demand plus local plan backlog in order to deliver the additional affordable housing needed. On what basis does the Council consider that this additional market-led housing will be delivered, given that it is more than its assessment of need/demand?”

If only 8727 new homes are actually needed, what evidence is there that the market will deliver the excess homes that are required to fund the affordable housing element? It seems highly likely that developers will ‘cherry pick’ their planning permission, pushing ahead with larger market houses and allowing the delivery of affordable homes to fall by the wayside. This pattern has been seen in practice in a number of developments in B&NES.

If the required affordable housing that is currently planned for delivery via Green Belt locations were instead delivered through 100% affordable developments, there could potentially be greater control over delivery.

Clearly upheld planning rules determine the value of land

As an example of the reality of the delivery of affordable housing, we note that Curo have stated (as reported in the Bath Chronicle) that they will need to build almost entirely market housing on the Foxhill ex-MOD site, in order to recoup the price paid to MOD. This is simply not acceptable. It should have been made absolutely clear that planning permission would not be granted on this site under any circumstances for any less than the required level of affordable housing. This would have forced MOD to accept a low price, in the knowledge that there was no flexibility in planning terms. The same approach should be taken with all sites on which a percentage of affordable housing is required: if the council sets out clear rules and sticks to them in planning decisions, then developers will adjust land values accordingly.

The Green Belt options

We do not support the proposed removal of sites from Green Belt. As stated above, we feel that the damage done to the

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Green Belt will outweigh the advantages of enabling a large excess of market housing in order to deliver the required number of affordable homes. We also question the deliverability of the required affordable homes if this method is used, as it seems unlikely that the market will be able to deliver 4229 more homes than are actually needed within the timescale set out.

However, we recognise that the current planning regime might leave B&NES Council with very limited options in moving towards an adopted Core Strategy. We will therefore comment separately and in detail on the proposed options for Green Belt sites.

**Change to the policy requested:**

We would like to see the proposed changes to Green Belt removed from the Core Strategy, and a different approach taken to achieving the required numbers of affordable housing. This approach would entail setting clearer and explicitly worded percentages for affordable housing within existing site allocations. If developers are working within an absolutely clear framework of requirements on affordable housing, land values can be adjusted to take this into account and make the required numbers deliverable. It is the possibility of developing sites with very low percentages of affordable housing that creates unrealistically high land prices, and this in turn makes the low numbers of affordable housing a certainty, with developers arguing that higher numbers would be undeliverable (as at MOD Foxhill).

**Respondent Number:** 4521 **Comment Number:** 1 **Respondent Name:** Sheila Neill

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** No comment on Strategic Sites

**Comment made on the Proposed Change:**

**Support:**

The Core Strategy is unsound as apparently 8727 houses are needed but 12956 are planned. The developers state that they need to make money on more full price houses to be able to build more affordable housing. Is there a connection between the developers' needs and the 4000 extra planned houses?

**Change to the policy requested:**

**Respondent Number:** 4538 **Comment Number:** 1 **Respondent Name:** Ned Garnett

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

The proposed number of houses is in excess of BANES's assessment of housing need and cannot be justified.

BANES has a requirement to build 8,727 houses 3,290 of which must be affordable housing (this represents 38% of the total). Yet the amendment to the core strategy is proposed to build 12,936 houses. The 4,209 further 'market' houses are not needed in Bath and would put unnecessary additional strain on an infrastructure that is already struggling to cope with the current demands being made of it. The amendment to the core strategy proposes accommodating these unnecessary additional houses by building on the green belt. This will go against the widely accepted principle of developing brownfield sites before greenfield ones.

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In BANES's response to an article in the Bath Chronicle of 28 November they said 'But because affordable housing is delivered as part of a market housing scheme (typically around 30 to 40 per cent in our area), and because there is a significant need for affordable housing in the area, we have had to increase the number of houses to meet affordable needs.'

8,727 houses will deliver 38% of affordable houses and therefore lies within BANES's range of 30 – 40%. This further undermines the argument to develop a further 4,209 houses and to unnecessarily destroy the green belt.

The prime driver behind the development of the green belt at Odd Down is the convenience of flat land with a willing seller who has undertaken a long running and well-funded campaign to develop on this land. Availability does not equate to suitability. The development of 300 new houses in a parish of 186 homes cannot be justified.

**Change to the policy requested:**

The plan should be amended to deliver only the BANES requirement of 8,727 houses and there should not be development in the green belt.

**Respondent Number:** 4538 **Comment Number:** 6 **Respondent Name:** Ned Garnett **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

The development of houses in the green belt goes against the National Planning Policy Framework and recent statements of government policy.

Paragraph 79 of the National Policy Planning Framework states that: "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

Paragraph 87 states "...inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."

Development of the Green Belt does not represent government policy as evidenced by recent statements by Eric Pickles such as: 'the green belt plays a vital role in stopping urban sprawl and we will protect it'.

The proposed development of houses on the South Stoke plateau represents urban sprawl, will significantly reduce the openness and be permanent. There are no very special circumstances to justify it and therefore is contrary to the National Planning Policy Framework.

**Change to the policy requested:**

The plan should be amended to deliver only the BANES requirement of 8,727 houses and there should not be development in the green belt.

**Respondent Number:** 4538 **Comment Number:** 5 **Respondent Name:** Ned Garnett **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Land adjoining Odd Down

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

The proposed number of houses is in excess of BANES's assessment of housing need and cannot be justified.

BANES has a requirement to build 8,727 houses 3,290 of which must be affordable housing (this represents 38% of the total). Yet the amendment to the core strategy is proposed to build 12,936 houses. The 4,209 further 'market' houses are not needed in Bath and would put unnecessary additional strain on an infrastructure that is already struggling to cope with the current demands being made of it. The amendment to the core strategy proposes accommodating these unnecessary additional houses by building on the green belt. This will go against the widely accepted principle of developing brownfield sites before greenfield ones.

In BANES's response to an article in the Bath Chronicle of 28 November they said 'But because affordable housing is delivered as part of a market housing scheme (typically around 30 to 40 per cent in our area), and because there is a significant need for affordable housing in the area, we have had to increase the number of houses to meet affordable needs.'

8,727 houses will deliver 38% of affordable houses and therefore lies within BANES's range of 30 – 40%. This further undermines the argument to develop a further 4,209 houses and to unnecessarily destroy the green belt.

The prime driver behind the development of the green belt at Odd Down is the convenience of flat land with a willing seller who has undertaken a long running and well-funded campaign to develop on this land. Availability does not equate to suitability. The development of 300 new houses in a parish of 186 homes cannot be justified.

**Change to the policy requested:**

The development of houses within the green belt should be removed from the Core Strategy Amendments.

**Respondent Number:** 4588 **Comment Number:** 1 **Respondent Name:**

**Respondent Organisation:** Withies Farm Landowners' Group,

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**Support: 

For reasons set out in previous representations (May 2013), and in evidence to the Examination Sessions in December 2013, the scale of growth is too low. Having regard to the distortion of past demographic trends for a combination of 'planning' and 'economic' reasons, all 'relevant' market and economic signals as required in accordance with the NPPF (paras. 17 and 158), and the NPPF objective to 'boost significantly' the supply of housing, an appropriate scale of housing during the current Plan period is 15,000-16,000 dwellings. The justification for a higher requirement is set out in full in the evidence of PCL Planning and others to the Examination sessions on 10th and 11th December 2013. The scale of growth currently identified by the Council would perpetuate past trends of suppressed housing growth caused by persistent under-delivery and, more recently, economic recession. That is an inappropriate basis on which to set a future housing requirement for the district, and an inappropriate policy response which would fail to meet the soundness tests of being 'positively prepared', 'justified' and 'consistent with national policy' (NPPF, para. 183).

Notwithstanding, and without prejudice to, the foregoing, objection is also raised to the proposed change in terms of the differentiation between what the Council considers is the 'objectively assessed' need for housing (8,727 dwellings), and the requirement that is to be identified in the plan (12,956 dwellings). For reasons discussed at some length at the Hearing sessions in December 2013, if 12,956 dwellings is the quantum that the Council deems to be necessary to deliver the combined requirements for market and affordable housing during the Plan period in accordance with the Plan's objectives, then that is the 'objectively assessed' need for the purposes of that period. There should therefore be no differentiation between the two, and any attempt to do so will cause confusion and uncertainty. The Plan should therefore be unequivocal in that the housing requirement for which the Council is making provision during the Plan period

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is a minimum of 13,000 dwellings (or whatever higher figure the Inspector might identify in response to the foregoing representations), and that this is the figure against which Plan monitoring, including the deliverable five year supply of housing, will be benchmarked.

Objection is also raised to the Spatial Distribution of housing set out in the Key Diagram and summarised in Table 1C. Since, following the Hearing Session in September 2013, it has been agreed that the Plan may proceed on the basis of a BNES-only SHMA, and does not need to have regard to, or accommodate, needs arising within the neighbouring authority areas, not least Bristol, there is no justification for the distribution of 200 dwellings to Whitchurch, which is effectively part of the Bristol urban area. To do so would be wholly inconsistent with the SHMA evidence base on which the Council is seeking to rely, and would result in an unsustainable development strategy.

To redistribute the proposed 200 dwellings for Whitchurch to East Keynsham would be a more sustainable development strategy. As is confirmed in Annex O to the Sustainability Appraisal (CD10/A1/3), East Keynsham has good accessibility to services/facilities and employment opportunities at not only Keynsham itself, but also at Bath and Bristol. It is therefore well-placed to accommodate the current SHMA requirements, together with any existing and/or future unmet needs arising within Bristol, which may become necessary in the short term following the publication of the new West of England SHMA.

Having regard to the above, and all the reasons set out in previous representations (May 2013: SPC110- SPC114 inclusive), the distribution of the housing requirement should be amended to increase provision at Keynsham to at least 3,000 dwellings through removal of the allocation at Whitchurch and a corresponding reduction in the proportion at Bath. This is considered to better reflect the acknowledged potential for Keynsham to attract high value jobs and reduce out-commuting, which is a key element of the vision for the town. Keynsham also has the capacity to absorb any additional requirement that the Inspector may identify following conclusion of the Examination process.

**Change to the policy requested:**

The following changes are sought:

- 1.26b and 1.26c and Table 1B.
- Amendment of paragraph 1.26a and Table 1A to refer to an objectively assessed need of a minimum of 15,000 dwellings.
- Omission of paragraphs
- Amendment of Table 1C to identify a minimum housing distribution to Keynsham of 3,000 dwellings, and removal of the distribution to Whitchurch.

**Respondent Number:** 4671 **Comment Number:** 2 **Respondent Name:** Colin Webb

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

CSA6; Development Plan CSA22; CSA23; Site Access and Transport CSA 22/7

CSA6 : A Definition of “sustainable” . In the planning context, it is said to mean “meeting the needs of the present without compromising the requirements of future generations”. But who is to judge what future requirements may be, and by whose criteria? In context to many compromised factors to do with heritage, environment and ecology as delineated through this process it is self evident that the requirements of future generations will be significantly compromised at the expense of eroding not meeting the needs of the present.

Clause 1.26d There should be zero impact on the environment and the Green belt.

Building in the Green Belt, AONB, setting of the World Heritage Site and adjacent to the Wansdyke is wrong and contravenes even the latest National Planning Policy Framework unless “exceptional circumstances” can be proved to exist, or in the case of Heritage assets (eg. Scheduled Ancient Monuments) “wholly exceptional circumstances”

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**Change to the policy requested:**

**Respondent Number:** 4686 **Comment Number:** 2 **Respondent Name:** Fiona Gourley

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

The Core Strategy is unsound as apparently around 8,500 houses are needed but nearly 13,000 are planned. The developers state that they need to make money on more market rate houses to be able to build more affordable housing. Yet one of the biggest issues for B&NES over this period is the lack of affordable houses that have been built in recent years and hence the pressure from the government to increase that number. It therefore does not make sense for the developers to decrease the ratio of affordable houses from 40% to 25% during the iterations of this plan. This plan will allow developers to build around 4,000 market rate houses over and above those required which is patently unjustified. [CSA16]

I think it is entirely unsound that AONB/Greenbelt land should be used for to build up to 75% market rate housing when more brownfield land is becoming available over the next 10 years than has been available in the past 25 years, with the development of the Western Riverside and the three MOD sites. These should be developed first and demand reassessed before any green belt or AONB land is even considered. The threat to AONB & greenbelt land is heightened in this amendment because developers will want to use it first because it is cheaper and easier to build on than brownfield land. As the proposed numbers of houses for B&NES are 4,000 in excess of the requirement (because of the dilution to 25% for affordable housing), the danger is that the AONB/greenbelt will be developed first and the brownfield sites not fully developed and the AONB/Greenbelt land is lost forever. [CSA16]

We are told that the main driver for the development in Bath is the lack of starter and social housing. In previous iterations of the plan, the ratio of affordable housing was 40% (in 2011). Yet this has been reduced to 25% in places in the amendments. This means that somewhere between 120 and 75 affordable homes are being proposed for the South Stoke/Odd Down AONB. This number could be accommodated in other developments outside the AONB; for example, in the Foxhill estate which will be built on the nearby former MOD site, or in two currently empty city centre sites - in the former DHSS office building on Charles Street or the derelict Green Park flats. The latter has been earmarked for student housing but could be ideal for local young people as they are even closer to employment and transport. [CSA16]

I would also like to query how this plan ties in with other housing developments planned in the immediate area, particularly around Bristol and South Gloucestershire. Where are the over 10,000 jobs coming from to justify all 13,000 new houses? Bath may have an increasing number of small creative and media companies, but it no longer has any significant industries. Companies are moving out to neighbouring counties with fewer heritage restrictions and one of the major employers, the MoD, has recently completely moved to Bristol. [CSA16]

**Change to the policy requested:**

**Respondent Number:** 4695 **Comment Number:** 3 **Respondent Name:** Richard Hemmings

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

**Change Reference:** CSA6

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**

Support:

3.1 As we have set out in the previous section of this report we do not believe that a sound Placemaking plan can be prepared until the significant issues associated with the Core Strategy are resolved.

3.2 Without prejudice to this position we now set out our specific comments on the launch document.

General Comments

3.3 The launch document does not grapple with the main issue of housing requirements in any detail. This underlines its failings as it should clearly have a headline chapter that sets out the requirements for both housing and employment land for BANES as a whole for the full plan period (plus the housing shortfall which has occurred over past years). This should then be broken down into the assessed requirement for each settlement including Keynsham.

3.4 The NPPF also sets great emphasis on plans being able to be flexible to respond to rapid change. If recession reoccurs or other factors mean development does not come forward as anticipated then allocated sites remain unused, which will have little impact on environmental assets. However, if insufficient land is allocated for development in times of high or unexpected demand the market cannot react because land supply will be constricted, which will have serious consequences for economic growth and prosperity. Therefore, whichever housing figures are eventually agreed as part of the Core Strategy and then brought forward into the Placemaking Plan, the housing requirements must be set as minimum targets, not maximums. Connected to this there needs to be policy(s) in place that can be triggered if further land over and above identified allocations is required.

3.5 At the current time the plan will not accommodate the flexibility to adapt to rapid change, which a key requirement of the NPPF and an objective of the Government's ministerial statement entitled: 'Planning for Growth' (23 March 2011).

3.6 At the current time the plan is the converse of a plan for growth, it is a plan for contraction as insufficient flexibility has been incorporated into it to allow it to react to rapid change.

3.7 We suggest that in areas which would be suitable to accommodate further growth, over and above that currently identified, reserve sites or growth options should be identified to allow the plan to react to rapid change.

3.8 It is considered that this is essential given that the Council's own Strategic Housing Market assessment has recently indicated potential housing requirements of up to 15,300 but now proposes 12,700 dwellings as its overall requirement in the latest version of its Core Strategy. If the economy improves significantly and a return to higher levels of growth occurs then even the 15,300 figure may prove to be insufficient. Accordingly the need for flexibility to deal with this is essential and such an approach is advocated by the NPPF.

3.9 However the housing requirement issue is not the only factor that requires that flexibility be built into the plan. We consider that any of the following eventualities mean that flexibility in housing land supply in particular is essential:

1. Five year land supply shortfalls;
2. The potential that a Core Strategy housing requirement is identified which is higher than that currently being planned for;
3. The potential that any of the currently identified sites do not come forward; and/or
4. Unanticipated demand for housing arises in later stages of the plan period as a result of unanticipated economic growth or demographic change (i.e. increased in-migration).

3.10 The identification of reserve sites, which would be released for development if any of the scenario's identified above were to happen would mean that flexibility is fully built into the Local Plan which will assist in making it sound and fully compliant with NPPF policy.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

**Respondent Number:** 4788 **Comment Number:** 3 **Respondent Name:** Stratland LLP

**Respondent Organisation:**

**Agent ID:** 182 **Agent Name:** Stratland LLP

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The Council has not 'undertaken an assessment of the needs of development within the District during the plan period' as described in CSA3 (paragraph 1.19a) to comply with paragraph 47 of the NPPF. An objection is therefore made to the Council's assessment of needs within the district during the plan period, which is reported as assessing the space needed for economic growth, housing, retail provision and social needs whilst also taking into account the Council's objective of promoting 'a higher value economy rather than only volume growth.'

The geography of the SHMA was discussed at the Hearing session on 17th September and there remain significant issues about the reliance that can be placed on the SHMA, as amended by Addenda 1a to 1c, which have been addressed in Statements for the Hearing sessions on 10th and 11th December.

Even if it is accepted that a SHMA can be prepared for just the District, it is still necessary to consider the implications of housing needs of neighbouring areas and especially Bristol, which have not been fully considered (contrary to the assertion in paragraph 1.18).

**Change to the policy requested:**

A more robust assessment is required of future housing requirements, recognising the underlying demographic, social and economic forces for change, based on a long-term view of trends in migration, household formation and economic activity and taking account of the impacts of housing demand in adjoining districts – in particular Bristol.

**Respondent Number:** 4788 **Comment Number:** 4 **Respondent Name:** Stratland LLP

**Respondent Organisation:**

**Agent ID:** 182 **Agent Name:** Stratland LLP

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

An objection is made to changes proposed to paragraph 1.26 a – d entitled "the scale and location of growth." The Council's approach to housing requirements as now set out in CSA6 appears to be different from the approach taken in the Proposed Changes and explained in the Council report of 4 March and in BNES/48 (undated, but produced in mid September, following the SHMA seminar on 2 August) which purports to explain SHMA Addenda 1a, 1b, and 1c.

There are several relatively insignificant changes in the overall housing figure: from 12,722 in the Council Report of March 2013 or 12,274 to 12,749 in Table 4 of Annex 1 of that Report; to 12,700 in the Proposed Changes to 12,749 in BNES/48; to 12,956 in CSA6 (paragraph 1.26b) of the Schedule of CS Amendments (which should be 12,936 unless the affordable housing figure is meant to be 3,310 rather than 3,290); and to 'around 13,000 homes' in Policy DW1 (CSA14). However the more significant change is what seems to be an attempt to present the headline figure of 12,956 (or 12,936) or 'around 13,000' as an estimate of housing land supply in Table 1B of CSA6, rather than a requirement on the demand side of the equation, as explained in the earlier documentation.

This change of 'interpretation' appears to be a sleight of hand to avoid assessing 5-year housing land requirements on the basis of the headline figure for total housing requirements. It requires far more explanation and justification than is presented in CSA6 or BNES/52, which was promised to provide further explanation but is not at all clear.

There are several errors in BNES/52 that make it difficult to follow, including 2.1, 3.34, the following table and Table A2ii (not including spelling errors that we consider to be de minimis). Having 'read with precision the construction of NPPF paragraph 157' we are unable to see how it supports a 'more refined approach' to housing land supply based on disaggregating market and affordable housing. It is misleading to separate the requirements for market and affordable housing when the delivery of most affordable housing is dependent on planning obligations linked to market housing.

The answers to 3.34 in BNES/52 (p 27ff) confuse requirements and supply; they appear to say that 12,956 is simply a forecast of supply, which fortuitously delivers (exactly) the requirement for affordable housing (3,310) by 'over-supplying' market housing (by 9,646 rather than 5,437). The basis for 12,956 as a supply figure and its relationship to the headline requirement figure included in the Proposed Changes require a full explanation from the Council.

Among the many contradictions that are not explained is how the apparent 'over-supply' of market housing (by 9,646 rather than 5,437) can be delivered – if there is no demand/requirement for this number of market homes. BNES/52 offers 'smoke and mirrors' rather than an explanation for the housing figures in Tables 1A and 1B of CSA6.

The NPPF expects Local Plans to meet the full, objectively assessed needs across their housing market area. Emerging Government Guidance confirms that needs should be assessed first, and independently of possible constraints to meeting them.

The Core Strategy had included a housing requirement of 12,700 dwellings in Policy DW1. This figure is proposed to be replaced by a table which sets out that the objectively assessed housing requirement comprises: - market housing 5,437 plus affordable housing 3,290 dwellings giving a total of 8,727 dwellings. The amendment CSA6 states that it is against these figures that the implementation of the plan will be monitored. "A five year land supply of specific deliverable sites will be maintained against this disaggregated District wide requirement for both market and affordable housing...."

The Inspector's note ID 40 at paragraphs 14 and 15 clearly states that the housing land supply should be assessed against the housing requirement in the Plan i.e. 12,700 dwellings.

Paragraph 14 states that:

"NPPF paragraph 47 refers to identifying sufficient deliverable sites to provide 5 years' worth of housing against the housing requirement, plus an appropriate buffer. In my view, the housing requirement is the requirement that has been (or, in this case, is proposed to be) identified in a Council's up-to-date, adopted development plan. It is the scale of housing that the Council is proposing to deliver."

Paragraph 15 states that:

"... the council's approach is not justified. It seeks to calculate the 5 year supply on the basis of the selected household projection (plus front-loaded local plan backlog) rather than the headline requirement which will be set out in the Core Strategy....More importantly the Council has concluded that 12,700 new homes are necessary and should be delivered over the plan period. This is what the council is promising to do and therefore this is the figure against which its delivery should be judged in calculating the 5 year supply."

BNES 51 states that the Council has proposed amendments to Policy DW1 but the full explanation of this "will be more helpfully set out as part of the Council's broader response to ID/42." In other words the justification will not be available until the Council have prepared and submitted their Hearing Statements on 22nd November. BNES 52 which responds to the Inspector's questions in ID/42 was published after 22nd November during the consultation period on the Core Strategy Schedule of Amendments.

The objective assessment of housing need now only indicates a figure of 8,727 dwellings for the plan period when previously the figure included in the plan was 8,637 dwellings (source: BANES 48 paragraph 20) The justification for this appears to be based on the revised SHMA and sensitivity testing. Pegasus Group have commented on this and prepared a Hearing Statement for the examination sessions on 10th and 11th December. Without repeating our Hearing Statement, in summary we object to the revised housing provision as proposed in the Schedule of Core Strategy Amendments November 2013.

Whilst the SHMA has been revised since the Core Strategy Proposed Changes was produced and considered by the Council

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

on 4th March, it is widely accepted and also evident in various documents produced by the Council that there has been an undersupply of housing and that there is a significant affordability issues in BANES, (Proposed Change CSA 3 to new paragraph 1.19b states that in terms of affordable housing need, Bath has one of the widest house price to earnings ratios outside of London and affordability varies across the district.)

National guidance states that, “the assessment will need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.”

The SHMA for Bath and North East Somerset (with its addenda) does not fulfil the requirements of the NPPF (paragraph 158), the DCLG Practice Guidance of March 2007 or the draft NPPG.

The Council’s reasoning about the need for additional market housing to deliver the required quantum of affordable housing is full of contradictions. If the additional housing is justified and capable of delivery, it must be part of the planning requirement and must form the basis for calculating the 5 year housing land supply with the addition of the backlog and a buffer as stated in ID/40, paragraph 13 – 15.

There is no justification for a disaggregated district wide housing requirement for both market and affordable housing, the concept is fraught with difficulties in terms of transparency and monitoring. The plan seems to be contradictory stating that the supply of market housing has been boosted to enable the delivery of the total affordable housing requirement. However, the next paragraph 1.26c states that “much of the supply of market housing is on sites that will not yield any affordable housing” so in order to attempt to monitor the supply of housing the Council have devised this disaggregated requirement, however, in practice it is not clear how the delivery of affordable housing will be monitored.

Table 1A Housing Requirement has a figure for affordable housing of 3,290 dwellings this also happens to the same figure in Table 1B Housing Land Supply.

Table 9 ‘Meeting the need for market and affordable housing’ in BNES 48 explains how the total of 12,749 dwellings is calculated but this table should be reproduced to show how latest figures in the plan in paragraph 1.26a – d area calculated (Change ref CSA6 in the Schedule of Core Strategy Amendments Nov 2013). Table 9 the figure for total housing is 8,637 which is from Table 2c based on Draft SHMA adjusted 2008 headship rates low trend migration. The figure for affordable housing is from Table 8 Draft SHMA adjusted 2008 headship rates low trend migration. (However, BNES 48 paragraph 34 refers to 3,110 affordable units plus a further 90 units), therefore should the total be 3,200 affordable in Table 1A of the Schedule of Core Strategy Amendments Nov 2013.

### Change to the policy requested:

Tables 1A and 1B in paragraph 1.26 should be revised to show a full objective assessment of housing requirements to meet market and affordable housing needs. The basis for Table 1B should be explained in term of housing requirements and not labelled, confusingly, housing land supply. It should also be consistent with the terminology used in Policy DW1 (CSA14) The total in Table 1B should be consistent with its component parts (which may mean correcting the affordable housing figure).

**Respondent Number:** 4803 **Comment Number:** 4 **Respondent Name:** Simon Steel-Perkins

**Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

### Comment made on the Proposed Change:

Support:

8. We disagree with the calculation of objectively assessed need and in particular how it will be used as a figure against which the implementation of the plan will be monitored. This is currently being considered and it is indisputable that it will change. The five year land supply of specific deliverable sites should use the target figure which is the objectively assessed housing requirement and included in the plan, ie 12,900 units as currently presented. The alternative disaggregated approach the Council is promoting is not sound and not based on any robust evidence, guidance or good practice. It is

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

merely a contrived mechanism to reduce the five year land supply and thereby reduce the number of houses that will be delivered. Pursuing a five year land supply that is not based on the objectively assessed need, means that the Council will fail to deliver the affordable housing required and which the Council has specifically identified as a key issue in the plan.

9. If the Council does not consider it can meet the required five year land supply, a properly evidenced phasing mechanism should be set out. The Inspector in his note ID40 is clear that the five year supply 'is the scale of housing that the Council is promising to deliver'. The Inspector is entirely correct in his interpretation of the five year land supply and consequently the Council's approach is not justified. While the issue is being considered at the examination hearings currently, this issue will need to be debated further through the examination, because it is fundamentally linked with the untested SHLAA and the assessment of available sites and the trajectories suggested.

10. The Council, in these amendments, sets out its approach for the first time of how the supply relates to the objectively assessed requirement and makes clear that the supply has been boosted entirely as a result of the total affordable housing requirement. As far as we are aware this is the first time a plan makes this explicit uplift. It is entirely appropriate for the plan to seek to meet the objectively assessed affordable housing need. However, if it is going to do that it needs to be straightforward in what it is doing, and needs to use information on different aspects of housing need consistently, rather than picking and choosing from different pieces of evidence to construct the answer it wants.

11. It is very likely that the scale of affordable need identified in the SHMA is not high enough. On the basis set out in the plan if the level of affordable housing need increases, so too will the provision of market housing required to deliver it. It is also necessary for the plan to recognise that not all the market sites will deliver affordable homes, and to ensure that the calculations are accurately built up from the SHLAA trajectories, which have been tested with developers and therefore considered robust.

**Change to the policy requested:**

**Respondent Number:** 4850 **Comment Number:** 1 **Respondent Name:** Mrs Dixon

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I would like to ask the following questions in relation to the green belt core strategy:

- What will be done to ensure the houses are affordable and are not simply snapped up by second home buyers and investors who can pay the premium prices?
- Will you ensure that first refusal is given to first time buyers with a LOCAL CONNECTION as has been done in areas of Devon, to ensure those who really need homes have the opportunity to purchase them?
- Housing (especially family houses) are in short supply therefore meaning prices of any new houses built could increase even further than the current average house price. Will you arrange a cap to house prices in the new developments so that they are affordable for first time buyers who have a local connection, rather than let the land developers thrive off the increased profits they will get by watching prices spiral as the many fight to obtain the few houses?

If none of the above is possible then what are the aims of building on the green belt, who will it really be benefiting? The reasons for my concerns are reflected by the example of the Lime Grove Gardens small housing development. They have three four bedroom houses still for sale - good news you may think for local families looking for housing - well each of these modest sized houses are selling for £649,950 each (still haven't been sold yet!) I believe without any proactive input by the council and developers that these are the prices we can expect from the new housing being proposed at the MOD site - and would that really help anyone locally, or be a good reason to sacrifice green belt?

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

**Respondent Number:** 5028 **Comment Number:** 1 **Respondent Name:** Alastair Gourley

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:** Comment on new sites

**Comment made on the Proposed Change:**

Support:

Hi. This plan is unsound. It's undeniable there is a need for affordable housing, so build the required number. Don't appease developers by allowing them to build market housing on Green Belt sites and AO, increasing the number of houses from 8,727 to 12,936.

9,646 + 3,290 = 12,936 not 12,956, as your document indicates. You haven't even got the basic maths right! Regardless, that's 4,209 or 4,229 too many whichever way you look at it.

You use the term "sustainable" to justify building on greenfield sites within the Green Belt and the AONB. This is not sustainable. The most sustainable solution is to build the required number of affordable houses on brownfield sites, thus reusing the land.

Where are the jobs that support these houses going to come from? This calls the validity of the plan in to question.

**Change to the policy requested:**

**Respondent Number:** 5029 **Comment Number:** 1 **Respondent Name:** Alison Wilding

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA6

**Location:**

**Comment made on the Proposed Change:**

Support:

**Change to the policy requested:**

- Bath has always been an expensive area in which to live and for this reason it is not an appropriate place to build starter homes. Traditionally, Radstock, Peasedown, Midsomer Norton, Keynsham and Whitchurch are the areas more suited to this type of housing. They also benefit from a easier geographical landscape and are not subject to the additional restrictions imposed by Bath's WHO status
- Further efforts should be made to redevelop existing brownfield sites, rather than continuing to gnaw at the edges of Bath's very precious green belt.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 5129 **Comment** 1 **Respondent** Laura Carpenter  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA6**Location:****Comment made on the Proposed Change:****Support:** 

It seems odd to suggest that high importance is given to Green Belt areas if in fact it is perfectly possible to eventually just build on them anyway. It indicates that land is considered an "area of outstanding natural beauty until we need to build on it". If this land is built on, it needs to be made very clear that the council has deliberately eroded this land designated as protected without first demonstrating that this is the only viable option. From what I understand from communications so far, there are still other alternatives that should be explored.

Building on this land undermines its fundamental use of preventing urban sprawl. The National Planning Policy Framework states that local authorities should only consider building on this land when the benefits of doing so clearly outweigh the damage that will be caused. I do not feel that the positives outweigh the damage and the attempts by the Core Strategy to list the benefits from the new development are very vague and do not seem to show any sort of allocated responsibility for actually addressing the potential issues. There is no mention of road improvements to support the additional cars from the new development and the local junctions are already at capacity. A large portion of the Bath skyline views in this area will be eroded, bat feeding areas will be encroached upon and it will put considerable on an already stretched local transport system and local roads. There are other areas that can still yet be developed before such a step is undertaken such as the Foxhill Hill and Bath West Riverside.

**Change to the policy requested:**

I believe that land should not be released from the current green belt designation, as this amendment suggests it will be.

**Respondent** 5139 **Comment** 3 **Respondent** Mr & Mrs D. Perry  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA6**Location:****Comment made on the Proposed Change:****Support:** **Change to the policy requested:**

Amend CSA6 (Table 1b and 1c) to reduce housing land supply in Bath by circa 50 (or the amount of housing intended to be developed on land to the west of Lansdown Lane, Weston)

**Respondent** 5160 **Comment** 1 **Respondent** Simon Prescott  
**Number:** **Number:** **Name:****Respondent** Barton Willmore  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA6**Location:****Comment made on the Proposed Change:**Support: 

I write to you in connection with the strategic allocation at Somerdale which is identified in the emerging Core Strategy (policy KE2) for the development of 700 homes, as well as significant employment floorspace, new leisure, open space, sport and recreation uses.

A hybrid application for up to 700 dwellings and other uses was submitted to BANES Council on 2nd April 2013 and validated on 5th May. The application was approved by the BANES Planning Committee on 25th September, with unanimous support, subject to conditions and the signing of a Section 106 agreement.

However, progress on the section 106 agreement is proving to be slow and has reached a hiatus. If the delays continue, then the developer will need to appeal against non-determination. The deadline for the submission of the appeal is 28th February 2014.

You will be aware that the Council's housing trajectory (November 2013) assumes that Somerdale will contribute 270 dwellings to the Council's five year housing land supply as follows:

(Please see original report for Table).

These delays will have implications for the delivery of homes at Somerdale which will need to be reflected in the Council's five year supply trajectory.

We will update you if there are any further developments or changes to timescales.

**Change to the policy requested:****Change Reference: CSA7****Respondent Number:** 246 **Comment Number:** 3 **Respondent Name:****Respondent Organisation:** Combe Hay Parish Council**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA7**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

**Change to the policy requested:**

Delete "and Odd Down".

**Respondent Number:** 276 **Comment Number:** 7 **Respondent Name:** Mr Charles Hignett**Respondent Organisation:** Hignett Family Trust**Agent ID:** 151 **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA7**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

The Council should amend CS7 to include reference to 'safeguarded land at Odd Down' where it is not allocated for housing, as it represents the the best and most sustainable location. The need for safeguarded land here will arise only if the overall housing requirement can be satisfied by existing or proposed allocations, which the Council and the Inspector considers outweighs the harm to any additional land at Odd Down. However the SHMA is based upon the Bath HMA only and will be subject to early review to take account of the WoE housing requirements and the needs of the City of Bristol. Many of the Green Belt sites, if they remain as allocations in this plan, will serve the housing needs of Bristol particularly following a review which finds a shortfall within the Bristol City area. This may lead to review of these other Green belt sites and their expansion to accommodate the needs of the WoE HMA.

**Change to the policy requested:**

Consequently, that review mechanism could substantiate a clear justification for use of safeguarded land at Odd `Down to address needs taken up by the WoE HMA. That means the Green Belt boundary could be subject alteration as a result of the review and certainly could be required by the end of the Plan period. In such circumstances, the land at Odd Down , to the east of the allocation should be safeguarded land and the text and plans so altered .

**Respondent** 4538 **Comment** 2 **Respondent** Ned Garnett**Number:****Number:****Name:****Respondent****Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA7**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

The development of houses in the green belt goes against the National Planning Policy Framework and recent statements of government policy.

Paragraph 79 of the National Policy Planning Framework states that: "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

Paragraph 87 states "...inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."

Development of the Green Belt does not represent government policy as evidenced by recent statements by Eric Pickles such as: 'the green belt plays a vital role in stopping urban sprawl and we will protect it'.

The proposed development of houses on the South Stoke plateau represents urban sprawl, will significantly reduce the openness and be permanent. There are no very special circumstances to justify it and therefore is contrary to the National Planning Policy Framework.

**Change to the policy requested:**

The development of houses within the green belt should be removed from the Core Strategy Amendments.

**Respondent** 4671 **Comment** 3 **Respondent** Colin Webb**Number:****Number:****Name:****Respondent****Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA7**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

CSA7 Do the council fully comprehend the 'smart growth' concept or have they explained their interpretation? If Smart growth is an urban planning and transportation theory that concentrates growth in compact walkable urban centers to avoid sprawl. Then the Odd Down development would achieve the opposite effect in the intensification of urban sprawl and the removal of the World heritage site buffer zone that has framed the city and provided a natural segue to the outlying villages and would replace it with concrete and chaos and coalesce the city with the countryside.

**Change to the policy requested:****Respondent Number:** 5024 **Comment Number:** 7 **Respondent Name:** Adrian Shields**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA7**Location:****Comment made on the Proposed Change:**Support: 

Green Belt/AONB

Building in the Green Belt , AONB , setting of the world heritage site and adjacent to the Wansdyke is wrong and contravenes even the latest National Planning Policy Framework unless 'exceptional circumstances' can be proved to exist, or in the case of Heritage assets ( Scheduled Ancient Monuments) "wholly exceptional circumstances"  
Reference CSA/7 . CSA/10 , CSA/17 , CSA/20 , CSA/21 , CSA / 22 and CSA/23 . BANES Policy B3a &NPFF clauses 79 - 88

**Change to the policy requested:****Change Reference: CSA8****Respondent Number:** 180 **Comment Number:** 5 **Respondent Name:****Respondent Organisation:** J S Bloor Ltd**Agent ID:** 19 **Agent Name:** Pegasus Planning Group**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA8**Location:** Land adjoining South West Keynsham**Comment made on the Proposed Change:**Support: 

The issue of safeguarding land from the Green Belt has not been addressed in the schedule of Core Strategy Amendments.

The NPPF at para 83 states that "In reviewing Green Belt boundaries LPAs should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of ensuring beyond the plan period."

Para 85 of the NPPF provides advice on defining boundaries, local planning authorities should:...

- "where necessary identify in their plans areas of safeguarded land between the urban area and the Green Belt, in order

to meet longer-term development needs stretching well beyond the plan period;

- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

The Inspector’s note ID 36 “Concerns in relation to evidence on the Strategic Locations and questions on Green Belt Matters Schedule of Proposed Amendments” states that the issue of safeguarded land is a strategic matter which the Core Strategy should be addressing so that the Place Making plan has a clear outcome to delivery.

In para 16 the Inspector emphasises that when Green Belt boundaries are reviewed they should endure beyond the plan period and that he could not see the evidence basis for the Council concluding that there is no scope to identify safeguarded land. (The Proposed Changes March 2013 para 6.64A stated that the issue of safeguarded land will be considered in the Place Making Plan – this is included in the Policies on SW Keynsham and also Whitchurch. In ID 36 the Inspector commented that the plan needed to provide a strategic steer, and that the issue of safeguarded land is a strategic matter which the Core Strategy should be addressing so that the Place-making Plan has a clear outcome to delivery.

The Schedule of Amendments only indicates that land will be safeguarded at East Keynsham.\* For Whitchurch the issue is postponed until the review of the plan. For South West Keynsham the amendments state that it is not considered that there is any scope to identify safeguarded land. It is not clear what the justification for this approach is.

The Sustainability Appraisal Addendum Report does not provide any analysis of safeguarding land in any location. It does however, acknowledge in paragraph 4.2 in the context of Policy DW1 that: “Safeguarded land for future development would have major positive effects on meeting social and economic objectives in that it gives a degree of certainty about continuity of housing provision.”

It is noted that the Site Appraisals, (Annex O) have helped to identify more specifically the areas with good potential to link to existing communities to promote vibrant and cohesive communities. They also help to avoid the areas without physical links or good potential to be linked by public transport or areas with disproportionality high infrastructure costs. However, this has not translated into any land being safeguarded apart from at East Keynsham and even this area the justification appears to be weak as it is reliant on necessary transport improvements in the A4 corridor - only when these have been secured will development be permitted.

Annex O the Green Belt Site Allocations Sustainability Appraisal is an addendum to the SA Report Annex L. However, it does not consider the issue of safeguarded land in the Green Belt. Consequently the schedule of amendments fails to address the strategic matter of safeguarded land.

The Council only identify land at East Keynsham to be safeguarded. The Council have indicated in some areas that the safeguarding issue will be addressed in a review of the Core Strategy, however there is no certainty over the timing of this review i.e. when it will be undertaken, particularly as the Council indicate that the first review will be timed to enable co-ordination with the review of the core strategies of adjoining authorities in the West of England. Whilst the Duty to Co-operate appears as a standing item on the West of England Planning Housing and Communities Board agenda, there is no commitment to any timetable for the review of Core Strategies and much will depend on the outcomes of the Joint SHMA which has been commissioned, but it is not expected to report until autumn 2014, and even then these will only be draft findings.

In respect of East Keynsham which seems to be the only area identified where land can be safeguarded, it is noted in Annex O that Area A is accessible to employment opportunities it is relatively remote from the town centre of Keynsham and to the north of the railway line and also the A4 and therefore without easy access to the existing community facilities and locate services by means of transport other than the private car, and has limited connections to neighbouring residential areas. The appraisal indicates that there are potential benefits of a vehicular linkage between the A4 and A4175 from the north of the railway line and there is potential for longer term transport improvements but the deliverability of these improvements is uncertain also the funding.

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

The area of land that is proposed to be safeguarded is to the south of the railway line and the A4 but it is considered that this would lead to coalescence issues with Saltford (Area C1), could also increase propensity for commuting given proximity to AR corridor and therefore Bath and Bristol. There is no capacity to expand the primary school and consequently a new primary school would be required, but this is still assessed as a positive. There is no justification for safeguarding this area is provided in Annex O.

The Inspector indicates in ID 36 para 18 that given that the Council is proposing much less development than explored in the Arup Concept Options Reports there seems potential scope for major subsequent debate about what areas the policies apply to and how broad the areas of search should be.

The safeguarding of land from the Green Belt should be addressed in the Core Strategy for BANES; this was previously referred to in the Proposed Changes March 2013 and delegated to the Place-making Plan. In the Proposed Changes each of the policies on the broad locations recognised that there would be a need to identify safeguard land to meet longer term development needs. However, this is now dismissed until a review of the Core Strategy. This approach is not consistent with the NPPF para 85 or indeed the Inspector's advice in ID 36.

The Inspector continues to raise concerns about safeguarded land in ID 40 para 24 – 25. The Council acknowledges in BANES 51 para 3.5 "that its proposed approach could be dependent on an external trigger for additional housing land such as the need to accommodate needs from Bristol. Such a requirement may not be forthcoming leaving the issue of safeguarded land in BANES unaddressed. It has therefore given the matter further consideration in the BANES context as part of the assessment of the allocation of sites below."

However, it should be noted that the Proposed Schedule of Amendments only refer to safeguarded land at East Keynsham in the plan period. The issue of safeguarded land is dismissed at South West Keynsham and at Whitchurch it is "put on hold" until the review.

At Odd Down no safeguarded land is identified - the council consider 300 dwellings constitutes the capacity limit and that development at a higher level would be harmful and dismiss the area for safeguarded land on the basis that Bath is the "more sustainable location and it would be inappropriate to safeguarded land in a sustainable location if it available now to meet development needs." The safeguarding of land however should be for the longer term.

The Proposed Schedule fails to address the issue of safeguarded land; it is unsound in the context of the NPPF and provides no flexibility in order to meet longer term requirements stretching beyond the plan period.

### Change to the policy requested:

The issue of safeguarded land should be addressed in accordance with the NPPF para 85 see comments on Change ref CSA37 Policy KE4 South West Keynsham.

**Respondent Number:** 275 **Comment Number:** 3 **Respondent Name:** Redrow Homes South West **Respondent Organisation:**

**Agent ID:** 164 **Agent Name:** DLP Planning Consultants

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA8

**Location:** Land adjoining South West Keynsham

### Comment made on the Proposed Change:

Support:

No reference is made to land to the west of Keynsham

The extent of the 'alternative option' identified on the plan at Annex 3 at Lays Farm, and identified with a potential capacity of 50 dwellings is based on wholly erroneous information as to the nature and position of a gas main shown on the (unnumbered) plan attached to the SHLAA and referred to by Arup in its review of Green Belt. This does not accord with the records held by Wales and West Utilities Ltd who own and operate the pipeline. The actual route of the pipeline runs some 100 metres further to the west (Ref: W&WU Pipeline Plan and letter from W&WU dated 12.06.2013 and attached at Appendix A to the Landscape and Visual Appraisal).

The impact of the existing pipeline on the development potential of the site is consequently minimal and certainly not such that would warrant disregarding it completely as a sustainable option. Moreover, it is feasible to divert the main, and Redrow have recently done just that elsewhere in Bristol, and by using modern materials it would further reduce any no-build easement to 6m.

This inaccurate information appears to have been the principal reason for Arup dismissing the land at Lays Farm as a serious option for release from the Green Belt, without properly assessing the scope for development here having regard to the purposes of Green Belt and in particular: preventing neighbouring towns merging into one another (i.e. Keynsham and Bristol); and preserving the setting and special character of historic towns (in this case, the Queen Charlton Conservation Area).

The site, south of Lays Farm (Ref: Area 10 BANES Sustainability Appraisal Report Annex L) is bound on two side by development and forms a far more logical addition to the built-up area of Keynsham than that proposed to be released from the Green Belt to the south (Ref: Area 13 BANES Sustainability Appraisal Report Annex L).

The Site is located adjacent to Charlton Road as it enters Keynsham from the south. It occupies an area of approximately 7.8 ha and is currently given over to pasture. Its northern and eastern boundaries are formed by built form, with its southern and western boundaries being rural in nature.

There is currently no public access onto the Site, although a well-used footpath runs along its southern boundary. There are no significant landscape features on the Site, other than the hedgerows which form the field boundaries.

The Site sits at an elevation of 72.5m AOD to 59.5m AOD, and is broadly flat in nature, sloping slightly downwards to its eastern boundary with Charlton Road.

The Site's landscape and visual relationship with its surroundings is primarily with the landscape of the Charlton Valley and Stockwood to the west.

The Site sits within the LCA5 'Dundry Plateau' of the Rural Landscape of Bath and North East Somerset, a rural Landscape Character Assessment and has an 'open' character, typical of this area.

The visual appraisal (attached) showed that the Site is partially visible from several locations to the west, but generally within the context of existing built form.

BANES has, through its consultants, Arups, reviewed the Green Belt gap between Keynsham and Stockwood and identified and noted the easternmost field on the Lays Farm Site as potentially suitable for development. This area is outlined as part of Alternative Option KM3 in Annex 3 of the Schedule of Core Strategy Amendments - November 2013.

Arups' West Keynsham Development Concept Options Report (March 2013), should be reviewed, as it placed an existing high pressure gas main inaccurately on the Lays Farm Site, and also incorrectly presumed an overly wide easement zone associated with it. The incorrect location of this main heavily influenced Arups' 'Developable Area' which has fed through into the Schedule of Core Strategy Amendments.

In light of these inaccuracies the Site was revisited and the reappraised with particular consideration being given to: (1) Potential visual impact across the Charlton Valley; and (2) The setting of Queen Charlton (Conservation Area).

The landscape development strategy for the Site (see attached) has evolved out of the findings of the landscape and visual appraisal and the now correctly located, high pressure gas main. The proposal is to introduce development into the north-eastern part of the Site, set back from the western boundary and to introduce a significant strip of structure planting that is complementary to that which is found in the locality.

The introduction of a robust, defensible edge would ensure that in the long term the setting of Queen Charlton and the character of the Charlton Valley are not adversely affected by the introduction of development. Similarly the 'rounding off' of development in this south-eastern corner of the town, and the inclusion of the woodland strip would ensure that the separate identities of Keynsham and Queen Charlton are preserved as well as ensuring that there would not be a future coalescence with Stockwood to the west.

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

As such we do not believe development on the Site would compromise the purposes of the Green Belt (Ref: NPPF Para 80) with particular reference to preventing Keynsham merging with Bristol and preserving the historic setting and special character of Queen Charlton.

As a consequence of the above, the Site should be considered for inclusion within the land to be removed from the Green Belt and allocated for up to 150 dwellings.

### Change to the policy requested:

Land is removed from the Green Belt to the west ... of Keynsham at Lays Farm.

**Respondent Number:** 276 **Comment Number:** 8 **Respondent Name:** Mr Charles Hignett **Respondent Organisation:** Hignett Family Trust

**Agent ID:** 151 **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA8

**Location:** Land adjoining Odd Down

### Comment made on the Proposed Change:

**Support:**

Amendments to para 1.28 are not accepted . There is capacity at Odd Down that means that the scale of the allocation at Keynsham and the area of safeguarded land should be reduced or removed, depending upon the out come of the assessment of the housing requirement. The needs arise from within the Bath HMA and Bath itself and therefore if there is capacity at Bath or on its immediate edge and the overall harm arising from any additional capacity at these locations ( ie Odd Down) is acceptable compared with alternative locations elsewhere in the GreenBelt, then the housing requirement should be met through delivery at Odd Down first.

The opportunity for the identification of safeguarded land is set out in NPPF. The parts of the Odd Down plateau , not allocated by the Council should be considered the most appropriate location for safeguarded land, ahead of land at Keynsham.

### Change to the policy requested:

Remove safeguarded land at Keynsham and remove reference to securing transport improvement on the A4 corridor justifying the development of this land. This is not a justification for identifying Green belt land as safeguarded land.

**Respondent Number:** 5116 **Comment Number:** 1 **Respondent Name:** Mark Howard **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA8

**Location:**

### Comment made on the Proposed Change:

**Support:**

The addition to the core strategy statement “Land is also removed from the Green Belt at East Keynsham and safeguarded for development for beyond the plan period. Development will only be permitted on this land when the necessary transport infrastructure improvements in the A4 corridor have been secured. “

Fundamentally we disagree with this change as it goes against the original principle of maintaining separation of the 2 communities of Keynsham and Saltford. In particular we do not agree with any further development adjacent to Grange Road on the West side of Saltford. We see this as erosion of the Green Belt by Stealth.

### Change to the policy requested:

Delete the proposed amendment so that the door for future development is closed.

**Change Reference: CSA9**

**Respondent Number:** 170 **Comment Number:** 4 **Respondent Name:** Robert Hitchins Ltd

**Respondent Organisation:**

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA9

**Location:**

**Comment made on the Proposed Change:**

Support:

Whilst the principle of releasing land from the Green Belt at Whitchurch is supported, an objection is made to the proposed allocated site ( see reps on CSA 45) and also that the issue of safeguarding land from the Green Belt has not been addressed in the schedule of Core Strategy Amendments.

The NPPF at para 83 states that “In reviewing Green Belt boundaries LPAs should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of ensuring beyond the plan period.”

Para 85 of the NPPF provides advice on defining boundaries, local planning authorities should...

- “where necessary identify in their plans areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

The Inspector’s note ID 36 “Concerns in relation to evidence on the Strategic Locations and questions on Green Belt Matters Schedule of Proposed Amendments” states that the issue of safeguarded land is a strategic matter which the Core Strategy should be addressing so that the Place Making Plan has a clear outcome to delivery.

In para 16 the Inspector emphasises that when Green Belt boundaries are reviewed they should endure beyond the plan period and that he could not see the evidence basis for the Council concluding that there is no scope to identify safeguarded land. (The Proposed Changes March 2013 para 6.64A stated that the issue of safeguarded land will be considered in the Place Making Plan – this is included in the Policies on SW Keynsham and also Whitchurch. In ID 36 the Inspector commented that the plan needed to provide a strategic steer, and that the issue of safeguarded land is a strategic matter which the Core Strategy should be addressing so that the Place-making Plan has a clear outcome to delivery.

The Schedule of Amendments only indicates that land will be safeguarded at East Keynsham.\* For Whitchurch the issue is postponed until the review of the plan. For South West Keynsham the amendments state that it is not considered that there is any scope to identify safeguarded land. It is not clear what the justification for this approach is.

The Sustainability Appraisal Addendum Report does not provide any analysis of safeguarding land in any location. It does however, acknowledge in paragraph 4.2 in the context of Policy DW1 that: “Safeguarded land for future development would have major positive effects on meeting social and economic objectives in that it gives a degree of certainty about continuity of housing provision.”

It is noted that the Site Appraisals, (Annex O) have helped to identify more specifically the areas with good potential to link to existing communities to promote vibrant ant cohesive communities. They also help to avoid the areas without physical links or good potential to be linked by public transport or areas with disproportionality high infrastructure costs. However, this has not translated into any land being safeguarded apart from at East Keynsham and even this area the justification appears to be weak as it is reliant on necessary transport improvements in the A4 corridor - only when these

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

have been secured will development be permitted.

Annex O the Green Belt Site Allocations Sustainability Appraisal is an addendum to the SA Report Annex L. However, it does not consider the issue of safeguarded land in the Green Belt. Consequently the schedule of amendments fails to address the strategic matter of safeguarded land.

The Council only identify land at East Keynsham to be safeguarded. The Council have indicated in some areas that the safeguarding issue will be addressed in a review of the Core Strategy, however there is no certainty over the timing of this review i.e. when it will be undertaken, particularly as the Council indicate that the first review will be timed to enable co-ordination with the review of the core strategies of adjoining authorities in the West of England. Whilst the Duty to Co-operate appears as a standing item on the West of England Planning Housing and Communities Board agenda, there is no commitment to any timetable for the review of Core Strategies and much will depend on the outcomes of the Joint SHMA which has been commissioned, but it is not expected to report until autumn 2014, and even then these will only be draft findings.

The Inspector indicates in ID 36 para 18 that given that the Council is proposing much less development than explored in the Arup Concept Options Reports there seems potential scope for major subsequent debate about what areas the policies apply to and how broad the areas of search should be.

The safeguarding of land from the Green Belt should be addressed in the Core Strategy for BANES; this was previously referred to in the Proposed Changes March 2013 and delegated to the Place-making Plan. In the Proposed Changes each of the policies on the broad locations recognised that there would be a need to identify safeguard land to meet longer term development needs. However, this is now dismissed until a review of the Core Strategy. This approach is not consistent with the NPPF para 85 or indeed the Inspector's advice in ID 36.

The Inspector continues to raise concerns about safeguarded land in ID 40 para 24 – 25. The Council acknowledges in BNES 51 para 3.5 "that its proposed approach could be dependent on an external trigger for additional housing land such as the need to accommodate needs from Bristol. Such a requirement may not be forthcoming leaving the issue of safeguarded land in BANES unaddressed. It has therefore given the matter further consideration in the BANES context as part of the assessment of the allocation of sites below."

However, it should be noted that the Proposed Schedule of Amendments only refer to safeguarded land at East Keynsham in the plan period. The issue of safeguarded land is dismissed at South West Keynsham and at Whitchurch it is "put on hold" until the review.

At Odd Down no safeguarded land is identified - the Council consider 300 dwellings constitutes the capacity limit and that development at a higher level would be harmful and dismiss the area for safeguarded land on the basis that Bath is the "more sustainable location and it would be inappropriate to safeguarded land in a sustainable location if it available now to meet development needs." The safeguarding of land however should be for the longer term.

The Proposed Schedule fails to address the issue of safeguarded land; it is unsound in the context of the NPPF and provides no flexibility in order to meet longer term requirements stretching beyond the plan period.

### Change to the policy requested:

The issue of safeguarded land should be addressed in accordance with the NPPF para 85 see comments on Change ref CSA 44 and 45.

**Respondent Number:** 276 **Comment Number:** 9 **Respondent Name:** Mr Charles Hignett

**Respondent Organisation:** Hignett Family Trust

**Agent ID:** 151 **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA9

**Location:** Land adjoining Odd Down

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

Amendments to para 1.30A are not accepted . There is capacity at Odd Down that means that the scale of the allocation at Whitchurch Green Belt should be reduced or removed, depending upon the out come of the assessment of the housing requirement. The needs arise from within the Bath HMA and Bath itself and therefore if there is capacity at Bath or on its immediate edge and the overall harm arising from any additional capacity at these locations ( ie Odd Down) is acceptable compared with alternative locations elsewhere in the Green Belt, then the housing requirement should be met through delivery at Odd Down first.

If the Council considers that such sites provide flexibility to boost supply and add choice then their capacity should be added to the overall housing provision however their suitability compared to Odd Down has not been adequately tested to demonstrate the harm at Odd Down, outweighs the sustainability arguments in favour of that site. Given the overall housing requirements and the need to boost supply and maintain a 5 Year Supply + 20%, such sites may be required in addition to the larger capacity at Odd Down demonstrated by Arup.

**Change to the policy requested:**

So the Council should increase the housing capacity at Bath to reflect the additional capacity at Odd Down and either reduce capacity at other locations or retain them, in order to boost supply.

**Respondent Number:** 3095 **Comment Number:** 6 **Respondent Name:**

**Respondent Organisation:** CPRE Avonside

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA9

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**Support: 

Land at Whitchurch

The Green Belt site at Whitchurch is not appropriate for development. Bristol City Council has stated on many occasions, including in its own adopted Core Strategy, that no urban extensions to the south of the city are required to meet housing need, and that in fact such urban extensions would be damaging to the efforts being made to stimulate regeneration within South Bristol. South Bristol contains extensive areas of brownfield land, the development of which would be greatly prejudiced by the availability of green field sites.

Furthermore, the transport access to Whitchurch Village is already extremely poor. Road congestion on the A37 is extreme at peak times, and Bristol has recently been identified as Britain's most congested core city in terms of car transport; bus transport is notoriously expensive within Bristol. In the absence of an effective public transport system, new development beyond the urban boundary can only add to Bristol's transport problems.

The alternative sites given in the consultation material would be highly damaging if developed. WH1 (Orchard Park) is the last remaining section in Green Belt land that remains open and creates the boundary and separation between the Bristol urban area and Whitchurch Village. If this site were to be developed, Whitchurch Village would entirely lose its sense of place as a distinct community. WH2, while not acting as a boundary between Bristol and Whitchurch, forms a strong element in the 'countryside' identity of Whitchurch Village. Again, with this area developed, Whitchurch would be surrounded by the urban area and would in effect have been swallowed into Bristol.

The development of both the preferred site and the alternative sites would be in clear opposition to the purposes of NPPF regarding Green Belt, as set out in NPPF 80.

**Change to the policy requested:**

We would like to see the Green Belt boundaries at Whitchurch left unaltered and this allocation removed from the Core Strategy.

**Change Reference:** CSA10

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 246 **Comment** 4 **Respondent**  
**Number:** **Number:** **Name:****Respondent** Combe Hay Parish  
**Organisation:** Council**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA10**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:****Support:** 

Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

**Change to the policy requested:**

For "five" read "four".

**Respondent** 5024 **Comment** 6 **Respondent** Adrian Shields  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA10**Location:****Comment made on the Proposed Change:****Support:** 

Green Belt/AONB

Building in the Green Belt , AONB , setting of the world heritage site and adjacent to the Wansdyke is wrong and contravenes even the latest National Planning Policy Framework unless 'exceptional circumstances' can be proved to exist, or in the case of Heritage assets ( Scheduled Ancient Monuments) "wholly exceptional circumstances"

Reference CSA/7 . CSA/10 , CSA/17 , CSA/20 , CSA/21 , CSA / 22 and CSA/23 . BANES Policy B3a &amp;NPFF clauses 79 - 88

**Change to the policy requested:****Change Reference: CSA11****Respondent** 276 **Comment** 10 **Respondent** Mr Charles Hignett  
**Number:** **Number:** **Name:****Respondent** Hignett Family Trust  
**Organisation:****Agent ID:** 151 **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA11**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:****Support:** 

The overall annual housing requirement should be maintained at 800 dwellings per year minimum. Amend the text changes. ( see Savill's SHMA evidence). The provision of 10,300 jobs should be expressed at 'net new jobs' ie it should take account of the Council's forecasts for job losses and changes as set out in CD9/EC1

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

Amend the text to refer to at least 800 dwellings per annum for the Plan Period. Refer to jobs target as 10,300 net new jobs , ( approximately 17000 new jobs created).

**Respondent Number:** 2564 **Comment Number:** 2 **Respondent Name:**

**Respondent Organisation:** Strategic Land Partnerships

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA11

**Location:**

**Comment made on the Proposed Change:**

**Support:**

We recognise the need to deliver 800 units per year in the first five years, and that this is a significant increase on past rates. This is the minimum required to be delivered through the five year supply, although a 20% flexibility buffer for choice and competition should also be applied to this figure. While existing sites will make a contribution to delivering this number of units, the strategic sites will need to be bought forward as soon as possible and will inevitably involve considerable timescales in their delivery. In order to ensure adequate flexibility in delivering the number of units required to meet the affordable housing needs for BANES it is necessary to allocate further deliverable sites.

**Change to the policy requested:**

**Respondent Number:** 2564 **Comment Number:** 8 **Respondent Name:**

**Respondent Organisation:** Strategic Land Partnerships

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA11

**Location:**

Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**

**Support:**

17. We recognise the need to deliver 800 units per year in the first five years, and that this is a significant increase on past rates. This is the minimum required to be delivered through the five year supply, although a 20% flexibility buffer for choice and competition should also be applied to this figure. While existing sites will make a contribution to delivering this number of units, the strategic sites will need to be bought forward as soon as possible and will inevitably involve considerable timescales in their delivery. In order to ensure adequate flexibility in delivering the number of units required to meet the affordable housing needs for BANES it is necessary to allocate further deliverable sites.

**Change to the policy requested:**

**Respondent Number:** 2564 **Comment Number:** 15 **Respondent Name:**

**Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA11

**Location:**

Comment on multiple Strategic Sites

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

12. We recognise the need to deliver 800 units per year in the first five years, and that this is a significant increase on past rates. This is the minimum required to be delivered through the five year supply, although a 20% flexibility buffer for choice and competition should also be applied to this figure. While existing sites will make a contribution to delivering this number of units, the strategic sites will need to be bought forward as soon as possible and will inevitably involve considerable timescales in their delivery. In order to ensure adequate flexibility in delivering the number of units required to meet the affordable housing needs for BANES, it is necessary to allocate further deliverable sites which will ensure flexibility to achieve the number of units required.

**Change to the policy requested:**
**Respondent Number:** 2564 **Comment Number:** 21 **Respondent Name:**
**Respondent Organisation:** Waddeton Park Limited
**Agent ID:** 128 **Agent Name:** Peter Brett Associates
**Further Information available in the original comment?**  **Attachments sent with the comment?** 
**Change Reference:** CSA11**Location:** Land adjoining East Keynsham**Comment made on the Proposed Change:**Support: 

6. We recognise the need to deliver 800 units per year in the first five years, and that this is a significant increase on past rates. This is the minimum required to be delivered through the five year supply, although a 20% flexibility buffer for choice and competition should also be applied to this figure. While existing sites will make a contribution to delivering this number of units, the strategic sites will need to be bought forward as soon as possible and will inevitably involve considerable timescales in their delivery. In order to ensure adequate flexibility in delivering the number of units required to meet the affordable housing needs for BANES, it is necessary to allocate deliverable sites which will ensure flexibility to achieve the number of units required.

**Change to the policy requested:**
**Respondent Number:** 4803 **Comment Number:** 5 **Respondent Name:** Simon Steel-Perkins

**Respondent Organisation:** Waddeton Park Limited
**Agent ID:** 128 **Agent Name:** Peter Brett Associates
**Further Information available in the original comment?**  **Attachments sent with the comment?** 
**Change Reference:** CSA11**Location:****Comment made on the Proposed Change:**Support: 

12. We recognise the need to deliver 800 units per year in the first five years, and that this is a significant increase on past rates. This is the minimum required to be delivered through the five year supply, although a 20% flexibility buffer for choice and competition should also be applied to this figure. While existing sites will make a contribution to delivering this number of units, the strategic sites will need to be bought forward as soon as possible and will inevitably involve considerable timescales in their delivery. In order to ensure adequate flexibility in delivering the number of units required to meet the affordable housing needs for BANES, it is necessary to allocate further deliverable sites which will ensure flexibility to achieve the number of units required.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4803 **Comment Number:** 15 **Respondent Name:** Simon Steel-Perkins**Respondent Organisation:** Waddeton Park Limited**Agent ID:** 128 **Agent Name:** Peter Brett Associates**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA11**Location:** Land adjoining East Keynsham**Comment made on the Proposed Change:**Support: 

6. We recognise the need to deliver 800 units per year in the first five years, and that this is a significant increase on past rates. This is the minimum required to be delivered through the five year supply, although a 20% flexibility buffer for choice and competition should also be applied to this figure. While existing sites will make a contribution to delivering this number of units, the strategic sites will need to be bought forward as soon as possible and will inevitably involve considerable timescales in their delivery. In order to ensure adequate flexibility in delivering the number of units required to meet the affordable housing needs for BANES, it is necessary to allocate deliverable sites which will ensure flexibility to achieve the number of units required.

**Change to the policy requested:****Change Reference: CSA13****Respondent Number:** 216 **Comment Number:** 5 **Respondent Name:** Mr & Mrs Hawkes**Respondent Organisation:** Crest Homes (SW)**Agent ID:** 174 **Agent Name:** Pegasus Planning Group**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA13**Location:****Comment made on the Proposed Change:**Support: 

Although the possibility of an early review in 2016 in conjunction with other West of England Core Strategies is referred to in paragraph 1.36 (CSA13), Policy DW1 (CSA14) and paragraph 7.05d (CSA53), there is no clear commitment to a review programme related to the West of England SHMA, with clear target dates for preparation and adoption.

In earlier Examination sessions we have heard reference to working with the West of England authorities, but there is no timetable and evidence of joint working apart from a standing item on the West of England Partnership Planning, Housing and Communities Board.

The Bristol Core strategy Inspector's Report (March 2011) states that a review of the provision of new homes will be reviewed within 5 years of adoption.

Bristol City should be considering a review as recommended by the Inspector in his report i.e. within 5 years. Apparently they will be amending their LDS next year and setting out a programme to review the Core Strategy (it will be referred to as the strategic policies of the Local Plan). The timescale will be set out ahead of the SHMA (a draft SHMA is still anticipated in autumn 2014). There is no joint timetable and the issue of the duty to co-operate is addressed under the headings in the West of England Duty to Co-operate Schedule.

From looking at the Bristol City website it seems that all work will be focussing on the Site Allocations and Development Management Policies DPD, which has been submitted to the Secretary of State (July 2013) and the Bristol Central Area Plan publication which will take their time in 2014. There is no timetable for a review if it is to be completed within 5yrs of adoption.

BNES 51 states that the amendments to the Core Strategy set out “more specifically the Council’s proposal for the review of the Core Strategy in light of the Inspector’s comments in ID 39 paragraph 15 and 16.”

There is no clear programme for a review of the BANES Core Strategy. Paragraph 1.36 of the Schedule of Core Strategy Amendments refers to the first review of the Core Strategy being programmed for around 2016 to co-ordinate with the other West of England districts. Policy DW1 paragraph 9 refers to reviewing the Core Strategy around five yearly intervals and when necessary, making changes to ensure the objectives are being achieved i.e. delivery of the housing and work space targets set out in Table 9 to ensure that there remains a flexible supply of deliverable and developable land and “the first review will be timed to co-ordinate with the review of the west of England Core Strategies in around 2016.”

Paragraph 7.05 also refers to the review being programmed to take place about every 5 years to enable flexibility in response to changing circumstances. “In light of the duty to Co-operate the first review will be timed to enable co-ordination with the review of the Core Strategies of adjoining authorities in the West of England.” However, from a search and review of information on the LPA websites and also the LEP there is no clear programme for a co-ordinated review, much seems to wait until the outcome of the SHMA which will not be produced in its final form until late 2015 (according to the pre-production brief consultation in March 2013, interim findings are anticipated in winter 2014/2015).

The BANES plan period has changed in the Proposed Changes in March 2013 from 2006 - 2026 to 2011 - 2029. Once adopted, Local Plans should provide for 15 years post adoption. If adopted next year it will only just provide for the 15 years and hence is not taking a longer term view of requirements (NPPF paragraph 157) i.e. “be drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements, and be kept up to date.” There is also a concern that any review is delayed while preparation of the Place Making Plan continues, in which case the longer term strategy is not addressed and the Council has failed to have regard to planning guidance which places a responsibility on local planning authorities to consider the longer term development needs when preparing local plans in order to avoid having to alter Green Belt boundaries at the end of plan period ( NPPF paragraph 85)

The issue of identifying safeguarding land as a possible pre-cursor to meeting future development needs is particularly appropriate given the commitment of the authorities in the former West of England to undertake a SHMA. The Inspector in considering the South Gloucestershire Plan acknowledged that the outcome of the study can be expected to have implications for future plan policies because it will provide the latest objective assessment of housing need. “In these circumstances it seems to me that there is a distinct possibility that a further assessment of Green Belt boundaries will be necessary as part of a wider plan review which I believe should be undertaken.”

**Change to the policy requested:**

Given the time taken to prepare the Core Strategy (the process was started in 2007), and in the absence of any quantification of unmet housing needs from Bristol City, there is clearly a need to keep the Core Strategy under review and consider the interaction between Bath and North East Somerset and neighbouring housing market areas. Consideration of these interactions is closely tied to the “duty to co-operate” which is a policy requirement of the NPPF paragraphs 178 – 181. It implies additional provision to meet the demands of Bristol, in particular, to avoid a shortfall against the needs of Bath and North East Somerset.

There is no reason why the review of the Core Strategy should be dependent on the review programme of its neighbouring authorities. There was, in this current round of preparation of plans, an opportunity to consider the implications of proposed housing figures but this was not auctioned. The Inspector for the South Gloucestershire Core Strategy concluded, in paragraph 87 of his report:

‘The outcome of the SHMA process also provides an opportunity for the Council to work with the other West of England Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region. While the authorities are at different stages in plan-making and plan review activities I do not consider this invalidates such an approach, particularly as each authority will have to have regard to the Duty to Cooperate.’

The plan should state that a review/replacement plan should be in place by end of 2018 and this will enable it to take account of the implications of the West of England SHMA. A date is necessary for monitoring purpose and to ensure that the review is not delayed as a result of other factors as has happened elsewhere when the Inspector has stated that an early review should be undertaken .

## Change Reference: CSA14

Respondent Number: 151    Comment Number: 1    Respondent Name:    Respondent Organisation: Dunkerton Parish Council

Agent ID:    Agent Name:

Further Information available in the original comment?     Attachments sent with the comment?

Change Reference: CSA14

Location:

Comment made on the Proposed Change:

Support: 

Dunkerton Parish Council is glad to see that policy DW1P prioritises brownfield development over Greenfield development

Change to the policy requested:

Respondent Number: 170    Comment Number: 6    Respondent Name: Robert Hitchins Ltd

Respondent Organisation:

Agent ID: 19    Agent Name: Pegasus Planning Group

Further Information available in the original comment?     Attachments sent with the comment? 

Change Reference: CSA14

Location:

Comment made on the Proposed Change:

Support: 

The expression of Policy DW1 is confusing and appears to differ from paragraph 1.26 (see comments on CSA6). If 13,000 homes are required to deliver the requirement for affordable housing, then that is the total housing requirement: calling it an increase in housing supply rather than a requirement does not change the facts: the total requirement is 13,000 and that is the basis on which the 5-year housing land supply should be assessed. These figures are, in any event, still subject to examination in the light of hearings on 10th and 11th December and statements have been submitted making the case for a much higher figure.

An objection is made to the proposed changes to Policy DW1 instead of an overall total housing provision of 12,700 dwellings for the plan period; this is disaggregated to a table providing figures for market housing and affordable housing, giving a total housing requirement of 8,727 dwellings.

The policy also includes new wording that the overall strategy for B&NES is to promote sustainable development by making provision to accommodate “an increase in the total housing supply to around 13,000 homes to enable the delivery of the affordable housing requirement”.

It is not clear in Policy DW1 how the 5 year housing land supply will be assessed.

BNES/48 states at paragraph 39 that the Council considers that in respect of the actual housing requirement it is judged for the purposes of 5 year land supply the figure of 8,727 is used as this is its adopted overall aggregate headline dwellings requirement, even though the Plan will actually deliver more than this.

The Inspector has already commented on this issue in ID/40 paragraph 14 which states that “NPPF paragraph 47 refers to identifying sufficient deliverable sites to provide 5 years’ worth of housing against the housing requirement, plus an appropriate buffer. In my view, the housing requirement is the requirement that has been (or, in this case, is proposed to be) identified in a Council’s up-to-date adopted development plan. It is the scale of housing that the Council is promising

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to deliver.....Once a plan is adopted; the calculation of the 5 year supply should not require interrogation of any background evidence to identify the housing requirement.”

Para 15 goes on to state that “the council has concluded that 12,700 new homes as necessary and should be delivered over the plan period. This is what the Council is promising to do and therefore is the figure against which its delivery should be judged in calculating the 5 year supply.”

Policy DW1 includes a new sentence “the first review will be timed to co-ordinate with the review of the west of England Core Strategies in around 2016.”

Comments have been made in response to Change ref CSA13. It is not clear from the new text proposed whether the review will commence in 2016, and if so what its timetable will be for preparation and when a complete review will be published to replace the Core Strategy. It is questionable what progress will be made on a review while the Placemaking/Site Allocations DPD is being prepared; the initial consultation on this document took place last month.

Although not a proposed change the policy gives priority to the use of brownfield opportunities, whereas BNES/ 52 page 27 states that brownfield sites are scheduled for later in the plan period and that it is the Green Belt sites that are envisaged “....to come forward in the first half of the plan period, including in the next 5 years.” This demonstrates the lack of a coherent strategy when it comes to addressing the housing requirement.

It appears that the Council’s disaggregate approach to assessing housing land supply is simply to avoid the need to allocate more market housing. The Council acknowledges in BNES/ 52 that to apply the Sedgfield approach to the calculation of housing land supply results in a need to deliver 977 dwellings per annum ( para j page 29 of BNES/52) and that the step up to achieve this given that the average for the last 3 years will be 507 is phenomenal. However, it should be noted that past delivery has been constrained by the allocation of sites that have been difficult to bring forward and the Council even refused an application on an allocated site in the adopted Local Plan which then had to go to appeal.

### Change to the policy requested:

Policy DW1 should be amended to include a single housing requirement which can then be used to assess the 5 year housing land supply.

**Respondent Number:** 170 **Comment Number:** 5 **Respondent Name:** Robert Hitchins Ltd

**Respondent Organisation:**

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

### Comment made on the Proposed Change:

Support:

Although the possibility of an early review in 2016 in conjunction with other West of England Core Strategies is referred to in paragraph 1.36 (CSA13), Policy DW1 (CSA14) and paragraph 7.05d (CSA53), there is no clear commitment to a review programme related to the West of England SHMA, with clear target dates for preparation and adoption.

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The Bristol Core strategy Inspector’s Report (March 2011) states that a review of the provision of new homes will be reviewed within 5 years of adoption.

Bristol City should be considering a review as recommended by the Inspector in his report i.e. within 5 years. Apparently they will be amending their LDS next year and setting out a programme to review the Core Strategy (it will be referred to as the strategic policies of the Local Plan). The timescale will be set out ahead of the SHMA (a draft SHMA is still anticipated in autumn 2014). There is no joint timetable and the issue of the duty to co-operate is addressed under the

headings in the West of England Duty to Co-operate Schedule.

From looking at the Bristol City website it seems that all work will be focussing on the Site Allocations and Development Management Policies DPD, which has been submitted to the Secretary of State (July 2013) and the Bristol Central Area Plan publication which will take their time in 2014. There is no timetable for a review if it is to be completed within 5yrs of adoption.

BNES 51 states that the amendments to the Core Strategy set out “more specifically the Council’s proposal for the review of the Core Strategy in light of the Inspector’s comments in ID 39 para 15 and 16.”

There is no clear programme for a review of the BANES Core Strategy. Para 1.36 of the Schedule of Core Strategy Amendments refers to the first review of the Core Strategy being programmed for around 2016 to co-ordinate with the other West of England districts. Policy DW1 para 9 refers to reviewing the Core Strategy around five yearly intervals and when necessary, making changes to ensure the objectives are being achieved i.e. delivery of the housing and work space targets set out in Table 9 to ensure that there remains a flexible supply of deliverable and developable land and “the first review will be timed to co-ordinate with the review of the west of England Core Strategies in around 2016.”

Para 7.05 also refers to the review being programmed to take place about every 5 years to enable a flexibility in response to changing circumstances. “In light of the duty to Co-operate the first review will be timed to enable co-ordination with the review of the Core Strategies of adjoining authorities in the West of England.” However, from a search and review of information on the LPA websites and also the LEP there is no clear programme for a co-ordinated review, much seems to wait until the outcome of the SHMA which will not be produced in its final form until late 2015 (according to the pre-production brief consultation in March 2013, interim findings are anticipated in winter 2014/2015).

The BANES plan period has changed in the Proposed Changes in March 2013 from 2006 - 2026 to 2011 – 2029. Once adopted Local Plans should provide for 15 years post adoption. If adopted next year it will only just provide for the 15 years and hence is not taking a longer term view of requirements ( NPPF para 157) i.e. “be drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements , and be kept up to date.” There is also a concern that any review is delayed while preparation of the Place Making Plan continues, in which case the longer term strategy is not addressed and the Council has failed to have regard to planning guidance which places a responsibility on local planning authorities to consider the longer term development needs when preparing local plans in order to avoid having to alter Green Belt boundaries at the end of plan period ( NPPF para 85)

The issue of identifying safeguarding land as a possible pre-cursor to meeting future development needs is particularly appropriate given the commitment of the authorities in the former West of England to undertake a SHMA. The Inspector in considering the South Gloucestershire Plan acknowledged that the outcome of the study can be expected to have implications for future plan policies because it will provide the latest objective assessment of housing need. “In these circumstances it seems to me that there is a distinct possibility that a further assessment of Green belt boundaries will be necessary as part of a wider plan review which I believe should be undertaken.”

**Change to the policy requested:**

Given the time taken to prepare the Core Strategy ( the process was started in 2007), and in the absence of any quantification of unmet housing needs from Bristol City there is clearly a need to keep the Core Strategy under review and consider the interaction between Bath and North East Somerset and neighbouring housing market areas. Consideration of these interactions is closely tied to the “duty to co-operate,” which is a policy requirement of the NPPF paragraphs 178 – 181. It implies additional provision to meet the demands of Bristol, in particularly, to avoid a shortfall against the needs of Bath and North East Somerset.

There is no reason why the review of the Core Strategy should be dependent on the review programme of its neighbouring authorities. There was, in this current round of preparation of plans, an opportunity to consider the implications of proposed housing figures but this was not auctioned. The Inspector for the South Gloucestershire Core Strategy concluded, in paragraph 87 of his report:

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**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

have regard to the Duty to Cooperate.’

The plan should state that a review/replacement plan should be in place by end of 2018 and this will enable it to take account of the implications of the West of England SHMA. A date is necessary for monitoring purpose and to ensure that the review is not delayed as a result of other factors as has happened elsewhere when the Inspector has stated that an early review should be undertaken.

**Respondent Number:** 180    **Comment Number:** 6    **Respondent Name:**    **Respondent Organisation:** J S Bloor Ltd

**Agent ID:** 19    **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

**Comment made on the Proposed Change:**

Support:

Although the possibility of an early review in 2016 in conjunction with other West of England Core Strategies is referred to in paragraph 1.36 (CSA13), Policy DW1 (CSA14) and paragraph 7.05d (CSA53), there is no clear commitment to a review programme related to the West of England SHMA, with clear target dates for preparation and adoption.

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From looking at the Bristol City website it seems that all work will be focussing on the Site Allocations and Development Management Policies DPD, which has been submitted to the Secretary of State (July 2013) and the Bristol Central Area Plan publication, which will take their time in 2014. There is no timetable for a review if it is to be completed within 5yrs of adoption.

BNES 51 states that the amendments to the Core Strategy set out “more specifically the Council’s proposal for the review of the Core Strategy in light of the Inspector’s comments in ID 39 para 15 and 16.”

However, there is no clear programme for a review of the BANES Core Strategy. Para 1.36 of the Schedule of Core Strategy Amendments refers to the first review of the Core Strategy being programmed for around 2016 to co-ordinate with the other West of England districts. Policy DW1 para 9 refers to reviewing the Core Strategy around five yearly intervals and when necessary, making changes to ensure the objectives are being achieved i.e. delivery of the housing and work space targets set out in Table 9 to ensure that there remains a flexible supply of deliverable and developable land and “the first review will be timed to co-ordinate with the review of the west of England Core Strategies in around 2016.”

Para 7.05 also refers to the review being programmed to take place about every 5 years to enable a flexibility in response to changing circumstances. “In light of the duty to Co-operate the first review will be timed to enable co-ordination with the review of the Core Strategies of adjoining authorities in the West of England.” However, from a search and review of information on the LPA websites and also the LEP there is no clear programme for a co-ordinated review, much seems to wait until the outcome of the SHMA which will not be produced in its final form until late 2015 (according to the pre-production brief consultation in March 2013, interim findings are anticipated in winter 2014/2015).

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Related to our concerns about the timetable for review is the issue of the plan period as now proposed. The BANES plan period has changed in the Proposed Changes in March 2013 from 2006 - 2026 to 2011 – 2029. Once adopted Local Plans should provide for 15 years post adoption. If adopted next year it will only just provide for the 15 years and hence is not taking a longer term view of requirements ( NPPF para 157) i.e. “be drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements , and be kept up to date.” There is also a concern that if any review is delayed while preparation of the Place Making Plan continues, the longer term strategy will not be addressed. It is considered that the Council has failed to have regard to planning guidance which places a responsibility on local planning authorities to consider the longer term development needs when preparing local plans in order to avoid having to alter Green Belt boundaries at the end of plan period ( NPPF para 85)

The issue of identifying safeguarding land as a possible pre-cursor to meeting future development needs is particularly appropriate given the commitment of the authorities in the former West of England to undertake a SHMA. The Inspector in considering the South Gloucestershire Plan acknowledged that the outcome of the study can be expected to have implications for future plan policies because it will provide the latest objective assessment of housing need. “In these circumstances it seems to me that there is a distinct possibility that a further assessment of Green belt boundaries will be necessary as part of a wider plan review which I believe should be undertaken.”

**Change to the policy requested:**

Given the time taken to prepare the Core Strategy ( the process was started in 2007), and in the absence of any quantification of unmet housing needs from Bristol City, there is clearly a need to keep the Core Strategy under review and consider the interaction between Bath and North East Somerset and neighbouring housing market areas. Consideration of these interactions is closely tied to the “duty to co-operate,” which is a policy requirement of the NPPF paragraphs 178 – 181. It implies additional provision to meet the demands of Bristol, in particularly, to avoid a shortfall against the needs of Bath and North East Somerset.

There is no reason why the review of the Core Strategy should be dependent on the review programme of its neighbouring authorities. There was, in this current round of preparation of plans, an opportunity to consider the implications of proposed housing figures, but this was not actioned. The Inspector for the South Gloucestershire Core Strategy concluded, in paragraph 87 of his report:

‘The outcome of the SHMA process also provides an opportunity for the Council to work with the other West of England Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region. While the authorities are at different stages in plan-making and plan review activities I do not consider this invalidates such an approach, particularly as each authority will have to have regard to the Duty to Cooperate.’

**Respondent Number:** 180 **Comment Number:** 7 **Respondent Name:**

**Respondent Organisation:** J S Bloor Ltd

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The expression of Policy DW1 is confusing and appears to differ from paragraph 1.26 (see comments on CSA6). If 13,000 homes are required to deliver the requirement for affordable housing, then that is the total housing requirement: calling it an increase in housing supply rather than a requirement does not change the facts: the total requirement is 13,000 and that is the basis on which the 5-year housing land supply should be assessed. These figures are, in any event, still subject to examination in the light of hearings on 10th and 11th December and statements have been submitted making the case for a much higher figure.

An objection is made to the proposed changes to Policy DW1 instead of an overall total housing provision of 12,700 dwellings for the plan period; this is disaggregated to a table providing figures for market housing and affordable housing,

giving a total housing requirement of 8,727 dwellings.

The policy also includes new wording that the overall strategy for B&NES is to promote sustainable development by making provision to accommodate “an increase in the total housing supply to around 13,000 homes to enable the delivery of the affordable housing requirement”.

It is not clear in Policy DW1 how the 5 year housing land supply will be assessed.

BNES/48 states at paragraph 39 that the Council considers that in respect of the actual housing requirement it is judged for the purposes of 5 year land supply the figure of 8,727 is used as this is its adopted overall aggregate headline dwellings requirement, even though the Plan will actually deliver more than this.

The Inspector has already commented on this issue in ID/40 paragraph 14 which states that “NPPF paragraph 47 refers to identifying sufficient deliverable sites to provide 5 years’ worth of housing against the housing requirement, plus an appropriate buffer. In my view, the housing requirement is the requirement that has been (or, in this case, is proposed to be) identified in a Council’s up-to-date adopted development plan. It is the scale of housing that the Council is promising to deliver.....Once a plan is adopted; the calculation of the 5 year supply should not require interrogation of any background evidence to identify the housing requirement.”

Para 15 goes on to state that “the council has concluded that 12,700 new homes as necessary and should be delivered over the plan period. This is what the Council is promising to do and therefore is the figure against which its delivery should be judged in calculating the 5 year supply.”

Policy DW1 includes a new sentence “the first review will be timed to co-ordinate with the review of the west of England Core Strategies in around 2016.”

Comments have been made in response to Change ref CSA13. It is not clear from the new text proposed whether the review will commence in 2016, and if so what its timetable will be for preparation and when a complete review will be published to replace the Core Strategy. It is questionable what progress will be made on a review while the Placemaking/Site Allocations DPD is being prepared; the initial consultation on this document took place last month.

Although not a proposed change the policy gives priority to the use of brownfield opportunities, whereas BNES/ 52 page 27 states that brownfield sites are scheduled for later in the plan period and that it is the Green Belt sites that are envisaged “...to come forward in the first half of the plan period, including in the next 5 years.” This demonstrates the lack of a coherent strategy when it comes to addressing the housing requirement.

It appears that the Council’s disaggregate approach to assessing housing land supply is simply to avoid the need to allocate more market housing. The Council acknowledges in BNES/ 52 that to apply the Sedgfield approach to the calculation of housing land supply results in a need to deliver 977 dwellings per annum ( para j page 29 of BNES/52) and that the step up to achieve this given that the average for the last 3 years will be 507 is phenomenal. However, it should be noted that past delivery has been constrained by the allocation of sites that have been difficult to bring forward and the Council even refused an application on an allocated site in the adopted Local Plan which then had to go to appeal.

**Change to the policy requested:**

Policy DW1 should be amended to include a single housing requirement which can then be used to assess the 5 year housing land supply.

**Respondent Number:** 184 **Comment Number:** 3 **Respondent Name:** Paul Davis

**Respondent Organisation:** Persimmon Homes  
Severn Valley

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

Persimmon Homes Severn Valley considers the last sentence of the proposed amendment which says that ‘the first review will be timed to coordinate with the review of the West of England Core Strategies in and around 2016’ is unclear. A clearer amendment is required to make it clear when an amended plan would be adopted as in the amendments proposed by the Inspector at the South Gloucestershire Core Strategy. He said in paragraph 86 of this report ‘I therefore consider South Gloucestershire should aim to adopt a replacement plan as soon as possible’ and ‘the timetable for the newly instigated SHMA process means this can and should be brought forward so that a review/replacement plan is in place by the end of 2018’ PHSV commend a similar approach here to provide a consistent approach.

**Change to the policy requested:**

1. A Policy commitment for a plan review to be completed by 2018

**Respondent Number:** 216 **Comment Number:** 6 **Respondent Name:** Mr & Mrs Hawkes

**Respondent Organisation:** Crest Homes (SW)

**Agent ID:** 174 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

**Comment made on the Proposed Change:**Support: 

The expression of Policy DW1 is confusing and appears to differ from paragraph 1.26 (see comments on CSA6). If 13,000 homes are required to deliver the requirement for affordable housing, then that is the total housing requirement: calling it an increase in housing supply rather than a requirement does not change the facts: the total requirement is 13,000 and that is the basis on which the 5-year housing land supply should be assessed. These figures are, in any event, still subject to examination in the light of hearings on 10th and 11th December and statements have been submitted making the case for a much higher figure.

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The policy also includes new wording that the overall strategy for B&NES is to promote sustainable development by making provision to accommodate “an increase in the total housing supply to around 13,000 homes to enable the delivery of the affordable housing requirement”.

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Para 15 goes on to state that “the council has concluded that 12,700 new homes as necessary and should be delivered over the plan period. This is what the Council is promising to do and therefore is the figure against which its delivery should be judged in calculating the 5 year supply.”

Policy DW1 includes a new sentence “the first review will be timed to co-ordinate with the review of the west of England Core Strategies in around 2016.” Comments have been made in response to Change ref CSA13. It is not clear from the new text proposed whether the review will commence in 2016, and if so what its timetable will be for preparation and

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

when a complete review will be published to replace the Core Strategy. It is questionable what progress will be made on a review while the Placemaking/Site Allocations DPD is being prepared; the initial consultation on this document took place last month.

Although not a proposed change the policy gives priority to the use of brownfield opportunities, whereas BNES/ 52 page 27 states that brownfield sites are scheduled for later in the plan period and that it is the Green Belt sites that are envisaged "...to come forward in the first half of the plan period, including in the next 5 years." This demonstrates the lack of a coherent strategy when it comes to addressing the housing requirement.

It appears that the Council's disaggregated approach to assessing housing land supply is simply to avoid the need to allocate more market housing. The Council acknowledges in BNES/52 that to apply the Sedgefield approach to the calculation of housing land supply results in a need to deliver 977 dwellings per annum (paragraph j page 29 of BNES/52) and that the step up to achieve this given that the average for the last 3 years will be 507 is phenomenal. However, it should be noted that past delivery has been constrained by the allocation of sites that have been difficult to bring forward and the Council even refused an application on an allocated site in the adopted Local Plan which then had to go to appeal.

The statement in paragraph 4 allows for no changes in the general extent of the Green Belt other than the sites allocated on the Policies Map. As commented on CSA1 above, this approach is far too restrictive. It allows for only 4 sites to be removed from the Green Belt, for 150 to 300 dwellings each. The Placemaking Plan will only be able to make detailed changes in Green Belt boundaries for 'anomalies or other necessary adjustments' which is likely to mean small sites of 5 dwellings or fewer. A more balanced portfolio of housing sites is needed adjoining existing Green Belt settlements, including strategic sites at Hicks Gate, Keynsham and the Somer Valley and smaller sites of 10 to 150 dwellings adjoining settlements such as Saltford.

### Change to the policy requested:

Policy DW1 should be amended to make clear the overall housing requirement as the basis for assessing 5-year housing land supply and to take a more detailed balanced approach to the review of Green Belt, A more balanced portfolio of housing sites is needed adjoining existing Green Belt settlements, to include strategic sites at Hicks Gate, Keynsham and the Somer Valley and smaller sites of 10 to 150 dwellings adjoining settlements such as Saltford.

**Respondent Number:** 219 **Comment Number:** 6 **Respondent Name:** Edward Ware Homes Limited **Respondent Organisation:**

**Agent ID:** 165 **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

### Comment made on the Proposed Change:

Support:

The expression of Policy DW1 is confusing and appears to differ from paragraph 1.26 (see comments on CSA6). If 13,000 homes are required to deliver the requirement for affordable housing, then that is the total housing requirement: calling it an increase in housing supply rather than a requirement does not change the facts: the total requirement is 13,000 and that is the basis on which the 5-year housing land supply should be assessed. These figures are, in any event, still subject to examination in the light of hearings on 10th and 11th December and statements have been submitted making the case for a much higher figure.

An objection is made to the proposed changes to Policy DW1 instead of an overall total housing provision of 12,700 dwellings for the plan period; this is disaggregated to a table providing figures for market housing and affordable housing, giving a total housing requirement of 8,727 dwellings.

The policy also includes new wording that the overall strategy for B&NES is to promote sustainable development by making provision to accommodate "an increase in the total housing supply to around 13,000 homes to enable the delivery of the affordable housing requirement".

It is not clear in Policy DW1 how the 5 year housing land supply will be assessed.

BNES/48 states at paragraph 39 that the Council considers that in respect of the actual housing requirement it is judged for the purposes of 5 year land supply the figure of 8,727 is used as this is its adopted overall aggregate headline dwellings requirement, even though the Plan will actually deliver more than this.

The Inspector has already commented on this issue in ID/40 paragraph 14 which states that “NPPF paragraph 47 refers to identifying sufficient deliverable sites to provide 5 years’ worth of housing against the housing requirement, plus an appropriate buffer. In my view, the housing requirement is the requirement that has been (or, in this case, is proposed to be) identified in a Council’s up-to-date adopted development plan. It is the scale of housing that the Council is promising to deliver.....Once a plan is adopted; the calculation of the 5 year supply should not require interrogation of any background evidence to identify the housing requirement.”

Para 15 goes on to state that “the council has concluded that 12,700 new homes as necessary and should be delivered over the plan period. This is what the Council is promising to do and therefore is the figure against which its delivery should be judged in calculating the 5 year supply.”

Policy DW1 includes a new sentence “the first review will be timed to co-ordinate with the review of the west of England Core Strategies in around 2016.”

Comments have been made in response to Change ref CSA13. It is not clear from the new text proposed whether the review will commence in 2016, and if so what its timetable will be for preparation and when a complete review will be published to replace the Core Strategy. It is questionable what progress will be made on a review while the Placemaking/Site Allocations DPD is being prepared; the initial consultation on this document took place last month.

Although not a proposed change the policy gives priority to the use of brownfield opportunities, whereas BNES/ 52 page 27 states that brownfield sites are scheduled for later in the plan period and that it is the Green Belt sites that are envisaged “...to come forward in the first half of the plan period, including in the next 5 years.” This demonstrates the lack of a coherent strategy when it comes to addressing the housing requirement.

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The statement in paragraph 4 allows for no changes in the general extent of the Green Belt other than the sites allocated on the Policies Map. As commented on CSA1 above, this approach is far too restrictive. It allows for only 4 sites to be removed from the Green Belt, for 150 to 300 dwellings each. The Placemaking Plan will only be able to make detailed changes in Green Belt boundaries for ‘anomalies or other necessary adjustments’ which is likely to mean small sites of 5 dwellings or fewer. A more balanced portfolio of housing sites is needed adjoining existing Green Belt settlements, including strategic sites at Hicks Gate, Keynsham and the Somer Valley and smaller sites of 10 to 150 dwellings adjoining settlements such as Saltford.

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**Respondent Number:** 219    **Comment Number:** 5    **Respondent Name:** Edward Ware Homes Limited    **Respondent Organisation:**

**Agent ID:** 165    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA14**Location:****Comment made on the Proposed Change:**Support: 

Although the possibility of an early review in 2016 in conjunction with other West of England Core Strategies is referred to in paragraph 1.36 (CSA13), Policy DW1 (CSA14) and paragraph 7.05d (CSA53), there is no clear commitment to a review programme related to the West of England SHMA, with clear target dates for preparation and adoption.

In earlier Examination sessions we have heard reference to working with the West of England authorities, but there is no timetable and evidence of joint working apart from a standing item on the West of England Partnership Planning, Housing and Communities Board.

The Bristol Core strategy Inspector's Report (March 2011) states that a review of the provision of new homes will be reviewed within 5 years of adoption.

Bristol City should be considering a review as recommended by the Inspector in his report i.e. within 5 years. Apparently they will be amending their LDS next year and setting out a programme to review the Core Strategy (it will be referred to as the strategic policies of the Local Plan). The timescale will be set out ahead of the SHMA (a draft SHMA is still anticipated in autumn 2014). There is no joint timetable and the issue of the duty to co-operate is addressed under the headings in the West of England Duty to Co-operate Schedule.

From looking at the Bristol City website it seems that all work will be focussing on the Site Allocations and Development Management Policies DPD, which has been submitted to the Secretary of State (July 2013) and the Bristol Central Area Plan publication which will take their time in 2014. There is no timetable for a review if it is to be completed within 5 years of adoption.

BNES 51 states that the amendments to the Core Strategy set out "more specifically the Council's proposal for the review of the Core Strategy in light of the Inspector's comments in ID 39 paragraph 15 and 16."

There is no clear programme for a review of the BANES Core Strategy. Paragraph 1.36 of the Schedule of Core Strategy Amendments refers to the first review of the Core Strategy being programmed for around 2016 to co-ordinate with the other West of England districts. Policy DW1 paragraph 9 refers to reviewing the Core Strategy around five yearly intervals and when necessary, making changes to ensure the objectives are being achieved i.e. delivery of the housing and work space targets set out in Table 9 to ensure that there remains a flexible supply of deliverable and developable land and "the first review will be timed to co-ordinate with the review of the west of England Core Strategies in around 2016."

Paragraph 7.05 also refers to the review being programmed to take place about every 5 years to enable flexibility in response to changing circumstances. "In light of the duty to Co-operate the first review will be timed to enable co-ordination with the review of the Core Strategies of adjoining authorities in the West of England." However, from a search and review of information on the LPA websites and also the LEP there is no clear programme for a co-ordinated review, much seems to wait until the outcome of the SHMA which will not be produced in its final form until late 2015 (according to the pre-production brief consultation in March 2013, interim findings are anticipated in winter 2014/2015).

The BANES plan period has changed in the Proposed Changes in March 2013 from 2006 - 2026 to 2011 - 2029. Once adopted, Local Plans should provide for 15 years post adoption. If adopted next year it will only just provide for the 15 years and hence is not taking a longer term view of requirements (NPPF paragraph 157) i.e. "be drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements, and be kept up to date." There is also a concern that any review is delayed while preparation of the Place Making Plan continues, in which case the longer term strategy is not addressed and the Council has failed to have regard to planning guidance which places a responsibility on local planning authorities to consider the longer term development needs when preparing local plans in order to avoid having to alter Green Belt boundaries at the end of plan period ( NPPF paragraph 85)

The issue of identifying safeguarding land as a possible pre-cursor to meeting future development needs is particularly appropriate given the commitment of the authorities in the former West of England to undertake a SHMA. The Inspector in considering the South Gloucestershire Plan acknowledged that the outcome of the study can be expected to have implications for future plan policies because it will provide the latest objective assessment of housing need. "In these

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circumstances it seems to me that there is a distinct possibility that a further assessment of Green Belt boundaries will be necessary as part of a wider plan review which I believe should be undertaken.”

**Change to the policy requested:**

Given the time taken to prepare the Core Strategy (the process was started in 2007), and in the absence of any quantification of unmet housing needs from Bristol City, there is clearly a need to keep the Core Strategy under review and consider the interaction between Bath and North East Somerset and neighbouring housing market areas. Consideration of these interactions is closely tied to the “duty to co-operate” which is a policy requirement of the NPPF paragraphs 178 – 181. It implies additional provision to meet the demands of Bristol, in particularly, to avoid a shortfall against the needs of Bath and North East Somerset.

There is no reason why the review of the Core Strategy should be dependent on the review programme of its neighbouring authorities. There was, in this current round of preparation of plans, an opportunity to consider the implications of proposed housing figures but this was not auctioned. The Inspector for the South Gloucestershire Core Strategy concluded, in paragraph 87 of his report:

‘The outcome of the SHMA process also provides an opportunity for the Council to work with the other West of England Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region. While the authorities are at different stages in plan-making and plan review activities I do not consider this invalidates such an approach, particularly as each authority will have to have regard to the Duty to Cooperate.’

The plan should state that a review/replacement plan should be in place by end of 2018 and this will enable it to take account of the implications of the West of England SHMA. A date is necessary for monitoring purpose and to ensure that the review is not delayed as a result of other factors as has happened elsewhere when the Inspector has stated that an early review should be undertaken.

**Respondent Number:** 244    **Comment Number:** 4    **Respondent Name:**    **Respondent Organisation:** HBF - Home Builders Federation

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

**Comment made on the Proposed Change:** Support: 

Finally under Change Reference CSA14 Policy DW1 Clause 9 and Change Reference CSA53 Paragraphs 7.05 – 7.05d, the Council sets out proposals for future reviews of the Core Strategy. An early review mechanism is an inappropriate remedy for an unsound plan. The proposed policy change in Policy DW1 Clause 9 is insufficient in its commitment to an early review to align with the review of neighbouring authorities Core Strategies and the work of the LEP on West of England SHMA. However it is understood that the appropriate wording for a policy on an early review will be discussed in further detail in the Examination Hearings in 2014.

**Change to the policy requested:**

**Respondent Number:** 246    **Comment Number:** 5    **Respondent Name:**    **Respondent Organisation:** Combe Hay Parish Council

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:** Land adjoining Odd Down

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Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

**Change to the policy requested:**

Bullet 2.c. - Reduce the over-provision of Market housing

Bullet 4 – Delete "Land adjoining Odd Down".

**Respondent Number:** 248**Comment Number:** 5**Respondent Name:****Respondent Organisation:** Crest Strategic Projects**Agent ID:** 30 **Agent Name:** RPS Planning & Development**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA14**Location:****Comment made on the Proposed Change:**Support: 

CSA6/CSA14

1) RPS objects to the manner in which the housing requirement is presented:

- RPS objects to the overall number and methodology for its calculation. These matters have been rehearsed at examination on 11/12 December.
- RPS does not accept the disaggregated approach to splitting the requirement between market and affordable homes.
- RPS does not accept that the five year requirement can be based on the 8,727 figure as opposed to the 12,956.

2) The whole approach is contrived so that the Council can demonstrate a five year supply of land at point of adoption of the plan.

3) Paragraph 1.26b states that the supply of market homes has been boosted to enable the delivery of the affordable housing requirement. The NPPF requires that the CS meets the FULL objectively assessed needs for market and affordable housing in the housing market area. The supply of homes cannot simply be boosted if the market does exist. B&NES must consider that it does otherwise the objectives of the CS cannot be fulfilled. If that is the case, then the number to test the five year supply is 12,956; it cannot be anything else. If B&NES does not consider that the market can support the delivery of 12,956 homes then the CS is fundamentally flawed. B&NES cannot adopt an interim position that is neither one thing nor the other.

4) The Inspector had asked the question of the Council what confidence there can be to deliver the 12,956 figure (of which 9,646 homes are market) if B&NES is arguing that the full market demand is 5,437. The response it gave in BNS/52 was unsatisfactory. In his verbal response to the Inspector, Counsel for B&NES stated that the 'other side of the table' had repeatedly expressed confidence regarding the strength of the market and that it can deliver those numbers. He went on to state that in the event the market in B&NES is not performing, because of the 'claimed unmet needs arising from Bristol', the numbers can somehow be fulfilled from that source.

5) The only way the 12,956 figure can be reached is via the unmet needs from Bristol (and other HMAs). B&NES has stated that the full, objectively assessed market demand is 5,437 not 9,646; that is the basis in which this CS is being examined. Counsel cannot reasonably state that the market can support it; if it can then the new requirement is 12,956 with a market homes contribution of 9,646.

6) If B&NES and its Counsel wish to maintain the current stance, and that the market will absorb unmet needs from Bristol, then the spatial strategy is fatally flawed. The 4,209 overprovision of market homes should not be directed towards Bath, but Bristol. The CS is unsound as a consequence.

7) The NPPF demands that a five year supply is demonstrated against the housing 'requirement'. The requirement in B&NES, to deliver the aims and objectives of the CS, is 12,956. If it fails to deliver that number then it has failed to meet the affordable housing needs of the District. It can be no other number.

8) It is not clear whether BANES is seeking to split the five year supply requirements/calculations between market and affordable housing. It would be nonsensical to do so, not least from a public scrutiny point of view where the plan is already more complex than it ever needs to be.

9) Whichever way B&NES now turns it will trip itself up. It can either:

- Accept that the requirement is 12,956 and that is the basis for the five year supply calculations, however, it cannot demonstrate a five year supply against this figure and the CS is not sound. This has already been shown to be the case in South Gloucestershire where that LPA could not demonstrate a five year supply at point of adoption of the plan and had to re-consult on additional allocations.
- Maintain the disaggregated approach and that the 5,437 figure will meet the full market needs of B&NES. The uplift of 4,209 to 9,646 will be met from households displaced from other HMAs (most probably Bristol). As such, the spatial strategy is flawed and the duty to cooperate has not been engaged.

**Change to the policy requested:**

Based on the above two scenarios there is now no scope to find the CS sound. Both outcomes require major modifications and there is no longer any context for that given the length of examination and costs incurred to date.

**Respondent Number:** 269    **Comment Number:** 6    **Respondent Name:**    **Respondent Organisation:** Barratt Homes Ltd

**Agent ID:** 174    **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

**Comment made on the Proposed Change:**

Support:

The expression of Policy DW1 is confusing and appears to differ from paragraph 1.26 (see comments on CSA6). If 13,000 homes are required to deliver the requirement for affordable housing, then that is the total housing requirement: calling it an increase in housing supply rather than a requirement does not change the facts: the total requirement is 13,000 and that is the basis on which the 5-year housing land supply should be assessed. These figures are, in any event, still subject to examination in the light of hearings on 10th and 11th December and statements have been submitted making the case for a much higher figure.

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**Agent ID:** 174  
**Agent Name:** Pegasus Planning Group

**Respondent Organisation:** Barratt Homes Ltd

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**Change Reference:** CSA14

**Location:**

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**Support:**

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**Change to the policy requested:**

Given the time taken to prepare the Core Strategy (the process was started in 2007), and in the absence of any quantification of unmet housing needs from Bristol City, there is clearly a need to keep the Core Strategy under review and consider the interaction between Bath and North East Somerset and neighbouring housing market areas. Consideration of these interactions is closely tied to the "duty to co-operate" which is a policy requirement of the NPPF paragraphs 178 – 181. It implies additional provision to meet the demands of Bristol, in particularly, to avoid a shortfall against the needs of Bath and North East Somerset.

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Strategy concluded, in paragraph 87 of his report:

‘The outcome of the SHMA process also provides an opportunity for the Council to work with the other West of England Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region. While the authorities are at different stages in plan-making and plan review activities I do not consider this invalidates such an approach, particularly as each authority will have to have regard to the Duty to Cooperate.’

The plan should state that a review/replacement plan should be in place by end of 2018 and this will enable it to take account of the implications of the West of England SHMA. A date is necessary for monitoring purpose and to ensure that the review is not delayed as a result of other factors as has happened elsewhere when the Inspector has stated that an early review should be undertaken.

**Respondent Number:** 275    **Comment Number:** 4    **Respondent Name:** Redrow Homes South West    **Respondent Organisation:**

**Agent ID:** 164    **Agent Name:** DLP Planning Consultants

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

**Comment made on the Proposed Change:**

Support:

No reference is made to land west of Keynsham in policy DW1 point 4

The extent of the ‘alternative option’ identified on the plan at Annex 3 at Lays Farm, and identified with a potential capacity of 50 dwellings is based on wholly erroneous information as to the nature and position of a gas main shown on the (unnumbered) plan attached to the SHLAA and referred to by Arup in its review of Green Belt. This does not accord with the records held by Wales and West Utilities Ltd who own and operate the pipeline. The actual route of the pipeline runs some 100 metres further to the west (Ref: W&WU Pipeline Plan and letter from W&WU dated 12.06.2013 and attached at Appendix A to the Landscape and Visual Appraisal).

The impact of the existing pipeline on the development potential of the site is consequently minimal and certainly not such that would warrant disregarding it completely as a sustainable option. Moreover, it is feasible to divert the main, and Redrow have recently done just that elsewhere in Bristol, and by using modern materials it would further reduce any no-build easement to 6m.

for Arup dismissing the land at Lays Farm as a serious option for release from the Green Belt, without properly assessing the scope for development here having regard to the purposes of Green Belt and in particular: preventing neighbouring towns merging into one another (i.e. Keynsham and Bristol); and preserving the setting and special character of historic towns (in this case, the Queen Charlton Conservation Area).

The site, south of Lays Farm (Ref: Area 10 BANES Sustainability Appraisal Report Annex L) is bound on two side by development and forms a far more logical addition to the built-up area of Keynsham than that proposed to be released from the Green Belt to the south (Ref: Area 13 BANES Sustainability Appraisal Report Annex L).

The Site is located adjacent to Charlton Road as it enters Keynsham from the south. It occupies an area of approximately 7.8 ha and is currently given over to pasture. Its northern and eastern boundaries are formed by built form, with its southern and western boundaries being rural in nature.

There is currently no public access onto the Site, although a well-used footpath runs along its southern boundary. There are no significant landscape features on the Site, other than the hedgerows which form the field boundaries.

ly flat in nature, sloping slightly downwards to its eastern boundary with Charlton Road.

The Site’s landscape and visual relationship with its surroundings is primarily with the landscape of the Charlton Valley and

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Stockwood to the west.

The Site sits within the LCA5 'Dundry Plateau' of the Rural Landscape of Bath and North East Somerset, a rural Landscape Character Assessment and has an 'open' character, typical of this area.

The visual appraisal (attached) showed that the Site is partially visible from several locations to the west, but generally within the context of existing built form.

BANES has, through its consultants, Arups, reviewed the Green Belt gap between Keynsham and Stockwood and identified and noted the easternmost field on the Lays Farm Site as potentially suitable for development. This area is outlined as part of Alternative Option KM3 in Annex 3 of the Schedule of Core Strategy Amendments - November 2013.

Arups' West Keynsham Development Concept Options Report (March 2013), should be reviewed, as it placed an existing high pressure gas main inaccurately on the Lays Farm Site, and also incorrectly presumed an overly wide easement zone associated with it. The incorrect location of this main heavily influenced Arups' Developable Area' which has fed through into the Schedule of Core Strategy Amendments.

In light of these inaccuracies the Site was revisited and the reappraised with particular consideration being given to: (1) Potential visual impact across the Charlton Valley; and (2) The setting of Queen Charlton (Conservation Area).

The landscape development strategy for the Site (see attached) has evolved out of the findings of the landscape and visual appraisal and the now correctly located, high pressure gas main. The proposal is to introduce development into the north-eastern part of the Site, set back from the western boundary and to introduce a significant strip of structure planting that is complementary to that which is found in the locality.

The introduction of a robust, defensible edge would ensure that in the long term the setting of Queen Charlton and the character of the Charlton Valley are not adversely affected by the introduction of development. Similarly the 'rounding off' of development in this south-eastern corner of the town, and the inclusion of the woodland strip would ensure that the separate identities of Keynsham and Queen Charlton are preserved as well as ensuring that there would not be a future coalescence with Stockwood to the west.

As such we do not believe development on the Site would compromise the purposes of the Green Belt (Ref: NPPF Para 80) with particular reference to preventing Keynsham merging with Bristol and preserving the historic setting and special character of Queen Charlton. As a consequence of the above, the Site should be considered for inclusion within the land to be removed from the Green Belt and allocated for up to 150 dwellings.

**Change to the policy requested:**

Land West of Keynsham at Lays Farm.

**Respondent Number:** 275 **Comment Number:** 5 **Respondent Name:** Redrow Homes South West

**Respondent Organisation:**

**Agent ID:** 164 **Agent Name:** DLP Planning Consultants

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**

**Support:**

Point 9 – the reference to reviewing the Core Strategy at around five yearly intervals is completely inadequate under the particular circumstances BANES finds itself in.

**Change to the policy requested:**

A clear and unequivocal commitment to Review the Core Strategy in the light of the West of England SHMA and in line with the timetable to review the other West of England Local Plans is the very minimum requirement and needs to be set out in Policy DW1.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 837 **Comment Number:** 7 **Respondent Name:** David Redgewell**Respondent Organisation:** South West Transport Network Railfuture**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA14**Location:****Comment made on the Proposed Change:****Support:** 

2470 homes need to be increased for rent. Whilst homes to rent and affordable housing. There is a need to create jobs in the Radstock, Westfield, Midsomer Norton area 900.

**Change to the policy requested:**

Not enough employment is being created in this area or under to duty to cooperate with the Mendip Core Strategy and Somerset County Council transport plan.

**Respondent Number:** 2564 **Comment Number:** 9 **Respondent Name:****Respondent Organisation:** Strategic Land Partnerships**Agent ID:** 128 **Agent Name:** Peter Brett Associates**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA14**Location:**

Comment on multiple Strategic Sites

**Comment made on the Proposed Change:****Support:** 

18. The district wide spatial strategy now identifies the objectively assessed need and total housing requirement as 8,727. However, this level of growth will not meet the affordable housing need and the supply is uplifted to 13,000 to enable delivery of the objectively assessed affordable housing. The policy now allocates specific green belt sites for development to meet the objectively assessed affordable housing need.

19. While we support the general strategy of focusing housing in Bath, Keynsham and the Somer Valley we consider that the level of housing requirement identified is lower than the objectively assessed need. The mechanism of uplifting the provision to deliver affordable housing requires achievable and deliverable sites. All of this is being considered by the Inspector and is highly likely to result in an increased level of provision which cannot be met through the current strategy.

**Change to the policy requested:****Respondent Number:** 2564 **Comment Number:** 16 **Respondent Name:****Respondent Organisation:** Waddeton Park Limited**Agent ID:** 128 **Agent Name:** Peter Brett Associates**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA14**Location:**

Comment on multiple Strategic Sites

**Comment made on the Proposed Change:****Support:** 

13. The district wide spatial strategy now identifies the objectively assessed need and total housing requirement as 8,727. However, this level of growth will not meet the affordable housing need and the supply is uplifted to 13,000 to enable delivery of the objectively assessed affordable housing. The policy now allocates specific green belt sites for development

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to meet the objectively assessed affordable housing need.

14. While we support the general strategy of focusing housing in Bath, Keynsham and the Somer Valley we consider that the level of housing requirement identified is lower than the objectively assessed need demonstrates. The mechanism of uplifting the provision to deliver affordable housing requires achievable and deliverable sites. All of this is being considered by the Inspector and is highly likely to result in an increased level of provision which cannot be met through the current strategy.

**Change to the policy requested:**

**Respondent Number:** 2564 **Comment Number:** 22 **Respondent Name:** **Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

7. The district wide spatial strategy now identifies the objectively assessed need and total housing requirement as 8,727. However, this level of growth will not meet the affordable housing need and the supply is uplifted to 13,000 to enable delivery of the objectively assessed affordable housing. The policy now allocates specific green belt sites for development to meet the objectively assessed affordable housing need.

8. While we support the general strategy of focusing housing in Bath, Keynsham and the Somer Valley, we consider that the level of housing requirement identified is lower than the objectively assessed need. The mechanism of uplifting the provision to deliver affordable housing requires achievable and deliverable sites. All of this is being considered by the Inspector and is highly likely to result in an increased level of requirement which cannot be met through the current strategy.

**Change to the policy requested:**

**Respondent Number:** 4588 **Comment Number:** 2 **Respondent Name:** **Respondent Organisation:** Withies Farm Landowners' Group,

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**

**Support:**

Criterion 2: For reasons set out in response to CSA6, there should be no differentiation between the objectively assessed need and the overall housing requirement of 13,000 dwellings that is identified in the Plan. Furthermore, the housing requirement should be increased to a minimum of 15,000 dwellings.

Criterion 4: For reasons set out in response to CSA6, 'Land at Whitchurch' should be removed from the Green Belt locations identified to meet the District's development needs during the current Plan period, and consequential amendments made to the Key Diagram and allocations on the Policies Map. Should the Inspector also take the view that a larger allocation at East Keynsham is a more sustainable and deliverable strategy than the proposed allocation at South West Keynsham, having regard to representations made in relation to CSA33 and to previous consultation (May 2013),

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then Land adjoining South West Keynsham should also be removed and consequential amendments made to the Key Diagram and Policies Map.

Criterion 9: In the event of the Inspector taking the view that the Plan may proceed on the basis of the identified housing requirement of a minimum of 13,000 dwellings, subject to early review in the light of the new West of England SHMA, then an earlier review than five years is likely to be necessary. This should be reflected in the wording. The wording should also allow for review in the event of an emerging evidence base, such as revised Household Projections or market and economic signals, indicating that the objectively assessed need for housing exceeds the requirement identified in the Plan.

**Change to the policy requested:**

- Removal of the differentiation between objectively assessed need and the housing requirement identified in the Plan, and increase in the housing requirement to a minimum of 15,000 dwellings.
- Removal of Whitchurch and/or South West Keynsham from the Green Belt locations identified to meet the District's development needs during the current Plan period.
- Amendment of the review triggers to allow for the possibility of an earlier review consequent upon the publication of the new West of England SHMA, or alternative evidence base indicating the housing requirement in the Plan to be out-of-date.

**Respondent Number:** 4788 **Comment Number:** 6 **Respondent Name:** Stratland LLP

**Respondent Organisation:**

**Agent ID:** 182 **Agent Name:** Stratland LLP

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The expression of Policy DW1 is confusing and appears to differ from paragraph 1.26 (see comments on CSA6). If 13,000 homes are required to deliver the requirement for affordable housing, then that is the total housing requirement: calling it an increase in housing supply rather than a requirement does not change the facts: the total requirement is 13,000 and that is the basis on which the 5-year housing land supply should be assessed. These figures are, in any event, still subject to examination in the light of hearings on 10th and 11th December and statements have been submitted making the case for a much higher figure.

An objection is made to the proposed changes to Policy DW1 instead of an overall total housing provision of 12,700 dwellings for the plan period; this is disaggregated to a table providing figures for market housing and affordable housing, giving a total housing requirement of 8,727 dwellings.

The policy also includes new wording that the overall strategy for B&NES is to promote sustainable development by making provision to accommodate "an increase in the total housing supply to around 13,000 homes to enable the delivery of the affordable housing requirement".

It is not clear in Policy DW1 how the 5 year housing land supply will be assessed.

BNES/48 states at paragraph 39 that the Council considers that in respect of the actual housing requirement it is judged for the purposes of 5 year land supply the figure of 8,727 is used as this is its adopted overall aggregate headline dwellings requirement, even though the Plan will actually deliver more than this.

The Inspector has already commented on this issue in ID/40 paragraph 14 which states that "NPPF paragraph 47 refers to identifying sufficient deliverable sites to provide 5 years' worth of housing against the housing requirement, plus an appropriate buffer. In my view, the housing requirement is the requirement that has been (or, in this case, is proposed to be) identified in a Council's up-to-date adopted development plan. It is the scale of housing that the Council is promising to deliver.....Once a plan is adopted; the calculation of the 5 year supply should not require interrogation of any background evidence to identify the housing requirement."

Para 15 goes on to state that "the council has concluded that 12,700 new homes as necessary and should be delivered over the plan period. This is what the Council is promising to do and therefore is the figure against which its delivery

should be judged in calculating the 5 year supply.”

Policy DW1 includes a new sentence “the first review will be timed to co-ordinate with the review of the west of England Core Strategies in around 2016.”

Comments have been made in response to Change ref CSA13. It is not clear from the new text proposed whether the review will commence in 2016, and if so what its timetable will be for preparation and when a complete review will be published to replace the Core Strategy. It is questionable what progress will be made on a review while the Placemaking/Site Allocations DPD is being prepared; the initial consultation on this document took place last month.

Although not a proposed change the policy gives priority to the use of brownfield opportunities, whereas BNES/ 52 page 27 states that brownfield sites are scheduled for later in the plan period and that it is the Green Belt sites that are envisaged “...to come forward in the first half of the plan period, including in the next 5 years.” This demonstrates the lack of a coherent strategy when it comes to addressing the housing requirement.

It appears that the Council’s disaggregated approach to assessing housing land supply is simply to avoid the need to allocate more market housing. The Council acknowledges in BNES/52 that to apply the Sedgefield approach to the calculation of housing land supply results in a need to deliver 977 dwellings per annum (paragraph j page 29 of BNES/52) and that the step up to achieve this given that the average for the last 3 years will be 507 is phenomenal. However, it should be noted that past delivery has been constrained by the allocation of sites that have been difficult to bring forward and the Council even refused an application on an allocated site in the adopted Local Plan which then had to go to appeal.

The statement in paragraph 4 allows for no changes in the general extent of the Green Belt other than the sites allocated on the Policies Map. As commented on CSA1 above, this approach is far too restrictive. It allows for only 4 sites to be removed from the Green Belt, for 150 to 300 dwellings each. The Placemaking Plan will only be able to make detailed changes in Green Belt boundaries for ‘anomalies or other necessary adjustments’ which is likely to mean small sites of 5 dwellings or fewer. A more balanced portfolio of housing sites is needed adjoining existing Green Belt settlements, including strategic sites at Hicks Gate, Keynsham and the Somer Valley and smaller sites of 10 to 150 dwellings adjoining settlements such as Saltford

**Change to the policy requested:**

Policy DW1 should be amended to make clear the overall housing requirement as the basis for assessing 5-year housing land supply and to take a more detailed balanced approach to the review of Green Belt, A more balanced portfolio of housing sites is needed adjoining existing Green Belt settlements, to include strategic sites at Hicks Gate, Keynsham and the Somer Valley and smaller sites of 10 to 150 dwellings adjoining settlements such as Saltford.

**Respondent Number:** 4788 **Comment Number:** 5 **Respondent Name:** Stratland LLP

**Respondent Organisation:**

**Agent ID:** 182 **Agent Name:** Stratland LLP

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

**Comment made on the Proposed Change:**

Support:

Although the possibility of an early review in 2016 in conjunction with other West of England Core Strategies is referred to in paragraph 1.36 (CSA13), Policy DW1 (CSA14) and paragraph 7.05d (CSA53), there is no clear commitment to a review programme related to the West of England SHMA, with clear target dates for preparation and adoption.

In earlier Examination sessions we have heard reference to working with the West of England authorities, but there is no timetable and evidence of joint working apart from a standing item on the West of England Partnership Planning, Housing and Communities Board.

The Bristol Core strategy Inspector’s Report (March 2011) states that a review of the provision of new homes will be reviewed within 5 years of adoption.

Bristol City should be considering a review as recommended by the Inspector in his report i.e. within 5 years. Apparently they will be amending their LDS next year and setting out a programme to review the Core Strategy (it will be referred to as the strategic policies of the Local Plan). The timescale will be set out ahead of the SHMA (a draft SHMA is still anticipated in autumn 2014). There is no joint timetable and the issue of the duty to co-operate is addressed under the headings in the West of England Duty to Co-operate Schedule.

From looking at the Bristol City website it seems that all work will be focussing on the Site Allocations and Development Management Policies DPD, which has been submitted to the Secretary of State (July 2013) and the Bristol Central Area Plan publication which will take their time in 2014. There is no timetable for a review if it is to be completed within 5yrs of adoption.

BNES 51 states that the amendments to the Core Strategy set out “more specifically the Council’s proposal for the review of the Core Strategy in light of the Inspector’s comments in ID 39 paragraph 15 and 16.”

There is no clear programme for a review of the BANES Core Strategy. Paragraph 1.36 of the Schedule of Core Strategy Amendments refers to the first review of the Core Strategy being programmed for around 2016 to co-ordinate with the other West of England districts. Policy DW1 paragraph 9 refers to reviewing the Core Strategy around five yearly intervals and when necessary, making changes to ensure the objectives are being achieved i.e. delivery of the housing and work space targets set out in Table 9 to ensure that there remains a flexible supply of deliverable and developable land and “the first review will be timed to co-ordinate with the review of the west of England Core Strategies in around 2016.”

Paragraph 7.05 also refers to the review being programmed to take place about every 5 years to enable flexibility in response to changing circumstances. “In light of the duty to Co-operate the first review will be timed to enable co-ordination with the review of the Core Strategies of adjoining authorities in the West of England.” However, from a search and review of information on the LPA websites and also the LEP there is no clear programme for a co-ordinated review, much seems to wait until the outcome of the SHMA which will not be produced in its final form until late 2015 (according to the pre-production brief consultation in March 2013, interim findings are anticipated in winter 2014/2015).

The BANES plan period has changed in the Proposed Changes in March 2013 from 2006 - 2026 to 2011 - 2029. Once adopted, Local Plans should provide for 15 years post adoption. If adopted next year it will only just provide for the 15 years and hence is not taking a longer term view of requirements (NPPF paragraph 157) i.e. “be drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements, and be kept up to date.” There is also a concern that any review is delayed while preparation of the Place Making Plan continues, in which case the longer term strategy is not addressed and the Council has failed to have regard to planning guidance which places a responsibility on local planning authorities to consider the longer term development needs when preparing local plans in order to avoid having to alter Green Belt boundaries at the end of plan period (NPPF paragraph 85)

The issue of identifying safeguarding land as a possible pre-cursor to meeting future development needs is particularly appropriate given the commitment of the authorities in the former West of England to undertake a SHMA. The Inspector in considering the South Gloucestershire Plan acknowledged that the outcome of the study can be expected to have implications for future plan policies because it will provide the latest objective assessment of housing need. “In these circumstances it seems to me that there is a distinct possibility that a further assessment of Green Belt boundaries will be necessary as part of a wider plan review which I believe should be undertaken.”

**Change to the policy requested:**

Given the time taken to prepare the Core Strategy (the process was started in 2007), and in the absence of any quantification of unmet housing needs from Bristol City, there is clearly a need to keep the Core Strategy under review and consider the interaction between Bath and North East Somerset and neighbouring housing market areas. Consideration of these interactions is closely tied to the “duty to co-operate” which is a policy requirement of the NPPF paragraphs 178 – 181. It implies additional provision to meet the demands of Bristol, in particular, to avoid a shortfall against the needs of Bath and North East Somerset.

There is no reason why the review of the Core Strategy should be dependent on the review programme of its neighbouring authorities. There was, in this current round of preparation of plans, an opportunity to consider the implications of proposed housing figures but this was not auctioned. The Inspector for the South Gloucestershire Core Strategy concluded, in paragraph 87 of his report: ‘The outcome of the SHMA process also provides an opportunity for the Council to work with the other West of England

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Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region. While the authorities are at different stages in plan-making and plan review activities I do not consider this invalidates such an approach, particularly as each authority will have to have regard to the Duty to Cooperate.'

The plan should state that a review/replacement plan should be in place by end of 2018 and this will enable it to take account of the implications of the West of England SHMA. A date is necessary for monitoring purpose and to ensure that the review is not delayed as a result of other factors as has happened elsewhere when the Inspector has stated that an early review should be undertaken.

**Respondent Number:** 4803 **Comment Number:** 6 **Respondent Name:** Simon Steel-Perkins **Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

**Comment made on the Proposed Change:**

**Support:**

13. The district wide spatial strategy now identifies the objectively assessed need and total housing requirement as 8,727. However, this level of growth will not meet the affordable housing need and the supply is uplifted to 13,000 to enable delivery of the objectively assessed affordable housing. The policy now allocates specific green belt sites for development to meet the objectively assessed affordable housing need.

14. While we support the general strategy of focusing housing in Bath, Keynsham and the Somer Valley we consider that the level of housing requirement identified is lower than the objectively assessed need demonstrates. The mechanism of uplifting the provision to deliver affordable housing requires achievable and deliverable sites. All of this is being considered by the Inspector and is highly likely to result in an increased level of provision which cannot be met through the current strategy.

**Change to the policy requested:**

**Respondent Number:** 4803 **Comment Number:** 16 **Respondent Name:** Simon Steel-Perkins **Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA14

**Location:**

Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

7. The district wide spatial strategy now identifies the objectively assessed need and total housing requirement as 8,727. However, this level of growth will not meet the affordable housing need and the supply is uplifted to 13,000 to enable delivery of the objectively assessed affordable housing. The policy now allocates specific green belt sites for development to meet the objectively assessed affordable housing need.

8. While we support the general strategy of focusing housing in Bath, Keynsham and the Somer Valley, we consider that the level of housing requirement identified is lower than the objectively assessed need. The mechanism of uplifting the provision to deliver affordable housing requires achievable and deliverable sites. All of this is being considered by the Inspector and is highly likely to result in an increased level of requirement which cannot be met through the current strategy.

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Change to the policy requested:

**Respondent Number:** 5139 **Comment Number:** 5 **Respondent Name:** Mr & Mrs D. Perry  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

Further Information available in the original comment?  Attachments sent with the comment?

Change Reference: CSA14

Location:

Comment made on the Proposed Change:

Support: 

Change to the policy requested:

Amend CSA14 (Policy DW1) to reduce total housing supply (2c) by circa 50 (or the amount of housing intended to be developed on land to the west of Lansdown Lane, Weston).

**Change Reference: CSA15**

**Respondent Number:** 86 **Comment Number:** 1 **Respondent Name:**  
**Agent ID:** **Agent Name:**

**Respondent Organisation:** Whitchurch Parish Council

Further Information available in the original comment?  Attachments sent with the comment?

Change Reference: CSA15

Location:

Comment made on the Proposed Change:

Support: 

Whitchurch Parish Council does not agree with these amendments for the reasons below.

Change to the policy requested:

**Respondent Number:** 246 **Comment Number:** 6 **Respondent Name:**  
**Agent ID:** **Agent Name:**

**Respondent Organisation:** Combe Hay Parish Council

Further Information available in the original comment?  Attachments sent with the comment?

Change Reference: CSA15

Location:

Land adjoining Odd Down

Comment made on the Proposed Change:

Support: 

Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

Change to the policy requested:

Delete Policy B3A.

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**Respondent Number:** 4926 **Comment Number:** 8 **Respondent Name:** Cllr Peter Edwards

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA15

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Ref CSA 15

Whitchurch Parish Council does not agree with these amendments for the reasons below.

**Change to the policy requested:**

**Change Reference: CSA16**

**Respondent Number:** 86 **Comment Number:** 2 **Respondent Name:**

**Respondent Organisation:** Whitchurch Parish Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA16

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Whitchurch Parish Council does not agree with the Strategic Green Belt release for 200 homes in Whitchurch Village.

**Change to the policy requested:**

**Respondent Number:** 246 **Comment Number:** 7 **Respondent Name:**

**Respondent Organisation:** Combe Hay Parish Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA16

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

**Change to the policy requested:**

Amend Diagram 4 to delete the Land Adjoining Odd Down.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 4926 **Comment** 7 **Respondent** Cllr Peter Edwards  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA16**Location:****Comment made on the Proposed Change:****Support:** 

Ref CSA 16

Whitchurch Parish Council does not agree with the Strategic Green Belt release for 200 homes in Whitchurch Village.

**Change to the policy requested:****Change Reference: CSA17****Respondent** 246 **Comment** 8 **Respondent**  
**Number:** **Number:** **Name:****Respondent** Combe Hay Parish  
**Organisation:** Council**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA17**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:****Support:** 

Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

**Change to the policy requested:**

Amend Diagram 5 to delete the Odd Down location.

**Respondent** 4538 **Comment** 3 **Respondent** Ned Garnett  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA17**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:****Support:** 

The development of houses in the green belt at Odd Down would be in an area that has already been defined as being 'particularly narrow'.

The independent ARUP report on the current green belt around Bath was commissioned by BANES. This states that: 'The Green Belt in this land parcel protects the individual character, identity and setting of South Stoke and Combe Hay. The remaining Green Belt gap between Bath and South Stoke is particularly narrow'.

Furthermore the area proposed to be removed from the green belt is more than twice the size needed for the stated requirement of 300 additional houses, and if allowed would result in the long term development of the entire site and the

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

complete removal of the green belt between Bath and South Stoke.

**Change to the policy requested:**

Remove the Development at the site at Odd Down from the Core Strategy Amendment.

**Respondent Number:** 5024 **Comment Number:** 5 **Respondent Name:** Adrian Shields**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA17**Location:****Comment made on the Proposed Change:****Support:** 

Green Belt/AONB

Building in the Green Belt , AONB , setting of the world heritage site and adjacent to the Wansdyke is wrong and contravenes even the latest National Planning Policy Framework unless 'exceptional circumstances' can be proved to exist, or in the case of Heritage assets ( Scheduled Ancient Monuments) "wholly exceptional circumstances"

Reference CSA/7 . CSA/10 , CSA/17 , CSA/20 , CSA/21 , CSA / 22 and CSA/23 . BANES Policy B3a &NPFF clauses 79 - 88

**Change to the policy requested:****Change Reference: CSA18****Respondent Number:** 246 **Comment Number:** 9 **Respondent Name:****Respondent Organisation:** Combe Hay Parish Council**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA18**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:****Support:** 

Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

**Change to the policy requested:**

Delete "Land adjoining Odd Down – 300"

**Respondent Number:** 4604 **Comment Number:** 6 **Respondent Name:****Respondent Organisation:** Barratt Homes Bristol**Agent ID:** 176 **Agent Name:** Nathaniel Lichfield & Partners**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA18**Location:** Land adjoining Whitchurch

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Policy B1(3) omits reference to the greenbelt release for 200 dwellings at Whitchurch. This is inconsistent with the amendments made elsewhere in the consultation document.

**Change to the policy requested:**

The Policy should include: Land at Whitchurch - 200

**Respondent Number:** 5139 **Comment Number:** 4 **Respondent Name:** Mr & Mrs D. Perry**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA18**Location:****Comment made on the Proposed Change:**Support: **Change to the policy requested:**

Amend CSA18 (Policy B1(3(a))) to reduce housing numbers planned for land adjoining Weston by circa 50 (or the amount of housing intended to be developed on land to the west of Lansdown Lane).

**Change Reference: CSA20****Respondent Number:** 222 **Comment Number:** 2 **Respondent Name:****Respondent Organisation:** Duchy of Cornwall**Agent ID:** 126 **Agent Name:** Woolf Bond Planning LLP**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA20**Location:** Comment on Alternative Options**Comment made on the Proposed Change:**Support: 

Introduction

3.1. We have already responded in relation to the spatial options for the allocation of land at bath in relation to the Proposed Changes consultation in May 2013.

3.2. The LPA Council has undertaken a review of the Green Belt and full details are set out in the "Green Belt Review Stage 1" Report prepared by Arup dated April 2013.

3.3. In assessing the additional technical reports undertaken by the Council as part of the evidence base to the proposed changes to the Core Strategy we have also considered the content at Appendix 1 to the March Committee and Annex L to the Sustainability Appraisal Report. Again, these matters were addressed in our representations submitted as part of that consultation process, and we rely on those submissions in making our case in relation to the suggested Amendments consultation.

Providing for Housing Growth at Bath

3.4. In light of the evidence base made available to the Examination Library, the Duchy supports any spatial strategy that seeks to provide for sustainable growth at Bath, the principal urban area in the District.

3.5. As set out in our Matter 2 Statement for the Examination Hearings in January 2012, providing for an urban extension

to Bath is necessary for the following reasons:

- (i) As confirmed in the evidence base, the housing need and employment opportunities are at Bath.
- (ii) Concerns remain about both the principle and the timely delivery of sites within the Bath urban area, including those within the floodplain (riverside).
- (iii) The identified housing need cannot be met by providing for delivery elsewhere in the District, in particular:
  - It is not possible to plan for growth on the edge of Bristol as BANES' own officers conclude that this does not represent the most sustainable option. The Inspector will also be aware of the associated traffic problems in planning for such a strategy. SPC18 clearly stated that a review of the Green Belt at Whitchurch is not well placed for Bath.
  - Significant development cannot be met at the rural villages due to inter alia, lack of sustainability including lack of employment opportunities.
  - It cannot be met by increasing delivery within the Somer Valley as this part of the District is already expected to deliver some 2,700 dwellings at a rate of approximately 135dpa which equates to the historic build rate. Moreover, the identified development sites comprise former employment sites and further development will exacerbate commuting and travel times into Bath creating a less sustainable pattern of growth.

3.6. Against the above background, we remain concerned about the sustainability merits of the spatial strategy, including having regard to the overall planning balance which matter is, amongst other things, assessed in relation to landscape and policy designations as well as sustainability credentials, of the additional site allocations put forward in the Amendments which include specific boundaries at Weston (150 dwellings) and Odd Down (300 dwellings).

3.7. The Duchy remains of the view that providing for growth a material amount of housing through allocations at Keynsham and Whitchurch will serve to meet housing growth needs arising from the population of Bristol and will not help meet bath related needs thus serving to further increase house prices within Bath and perpetuating the shortage of housing and lack of affordability. This matter is addressed in relation to Amendments CSA22, CSA27 and CSA45 below.

3.8. In relation to Bath-centric matters, the additional site allocations at Odd Down, Weston and Ensleigh require amendments to the Green Belt boundary and well as the development of land designated as being located within the AONB.

3.9. As set out at paragraph 115 of the NPPF:

“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural beauty, which have the highest status of protection in relation to landscape and scenic beauty..”

3.10. All three sites proposed for development on the edge of Bath are partly within the WHS and all are within the AONB. There is no evidence to suggest that English Heritage has been formally consulted and/or whether detailed studies have been undertaken in relation to the impact of the ‘selected’ sites on the setting of the WHS.

3.11. In contrast, land West of Twerton is located outside the WHS boundary and a detailed Heritage Report has been commissioned which considers the acceptability of the site in this regard. Further information is set out at paragraph 3.29 onwards of our May 2013 consultation response upon the Proposed Changes, on which content we rely.

3.12. Notwithstanding our concerns relating to the site selection process, which approach we consider is unsound (including for the reasons set out in previous submissions), one of the principle objectives at paragraph 85 of the NPPF (fifth bullet), to be undertaken by local planning authorities when defining/reviewing Green Belt boundaries is that they should:

“Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.”

3.13. The requirement at paragraph 83 of the NPPF is that:

“...authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”.

3.14. Paragraph 84 of the NPPF requires LPAs, when reviewing GB boundaries, to take account of the need to promote sustainable patterns of development.

3.15. These principles have not been met and is the principal reason as to why we remain of the view that the Core Strategy remains unsound.

- 3.16. Page 6 of the Arup Green belt Study refers to the above exert from the NPPF, stating: “...the Council should consider alterations (to the GB) with a very long timescale in mind to limit the risk of ad hoc alterations being required during and beyond the Core Strategy period”.
- 3.17. Page 6 of the Arup GB Study acknowledges that the Green Belt Study only looks at wider sustainability issues at a basic level and that it needs to be considered alongside the Sustainability Appraisal. We address this matter in more detail below.
- 3.18. The conclusion reached in the GB review is ambiguous at best in that it fails to provide a scoring matrix and or clarify which of the sites/locations/land parcels represent the most appropriate location in providing for a review of the GB boundary having regard to the five roles set out in the NPPF. Moreover, and of material significance, is the fact that the GB review fails to consider the permanence of the GB boundaries beyond the plan period. This may be a result of their initial scope, although this matter remains unclear and requires clarification.
- 3.19. As part of the review of possible locations in providing for housing development as part of a review of the Green Belt adjoining Bath, the Council commissioned a report from Arup (CD4/ENV6) to assess the feasibility of building on slopes at West of Twerton and Odd Down. The report has not assessed the land at Weston which is much greater in gradient. The Inspector will no doubt wish to avail himself of the information and review the background to the Council’s site selection leading up to and during the hearings.
- Sustainability Appraisal
- 3.20. Annex L to the Sustainability Appraisal sets out an assessment of the alternative sites. Stage 2 sets out an assessment of the Bath environs, recommending areas 3ii, 4, 14 and 17 to be assessed in more detail through the stage 3 assessment (site specific assessments).
- 3.21. The proposed allocations at Keynhsam, Whitchurch, MOD Ensleigh, Odd Down and Summer Valley are assessed in the SA as is land west of Twerton.
- 3.22. The stage 3 assessments provide a critique of the merits of the sites against the SEA/SA objectives.
- 3.23. The assessments identify adverse impacts associated with certain of the proposed allocations including in relation to landscape considerations namely the AONB3.
- 3.24. Development, particularly at Odd Down and Weston will have related impacts upon the setting of the Bath World Heritage Site (“WHS”).
- 3.25. Based upon the scoring matrix used to assess the suitability of land to the west of Twerton, the authors do not appear to have been provided with the site material previously submitted to the Examination which includes, but is not limited to, Annex A to our Issue 3 Statement concerning site specific matters nor Annex 3 to our submission upon the Significant Changes consultation, the content of which sets out an assessment of the site having regard to, inter alia, landscape and sustainability matters. These are significant considerations that do not appear to have been included in the SA, which material has been submitted, is in the public domain, should be on the Council’s database and which is a material consideration of significant weight.
- 3.26. It is for the reasons set out above that we question the findings of the SA in relation to the site.

**Change to the policy requested:**

**Respondent Number:** 246    **Comment Number:** 10    **Respondent Name:**

**Respondent Organisation:** Combe Hay Parish Council

**Agent ID:**            **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA20**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

**Change to the policy requested:**

Delete "Odd Down" – twice.

Delete "Policy B3A" – twice.

**Respondent Number:** 828 **Comment Number:** 1 **Respondent Name:****Respondent Organisation:** Deeley Freed Estates Ltd**Agent ID:** **Agent Name:** Martin Bailey**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA20**Location:** Comment on multiple Strategic Sites**Comment made on the Proposed Change:**Support: 

The Council's spatial strategy for accommodating much needed new housing is: "..... to locate new development in the most sustainable locations and therefore the priority is to steer growth primarily to brownfield land in urban areas of Bath, Keynsham and the larger settlements in the Somer Valley." (Draft Core Strategy Composite March 2013, para 1.26).

It follows that good use needs to be made of brownfield land in the urban areas and cautious, judicious use of land is less sustainable locations, in particular Green Belt land.

The November 2013 proposed changes defining land to be taken out of the Green Belt and revised Green Belt boundaries appears to demonstrate that the Council is seeking to act: (a) contrary to national Green Belt policy in the NPPF and (b) contrary to its own strategy (and NPPF policy) which requires development to take place in the most sustainable locations.

(a) The Council is Seeking to Act Contrary to National Green Belt Policy

National policy on Green Belts (NPPF section 9, paragraphs 79-92) clearly sets out the importance to be attached to Green Belts and their essential characteristics of openness and permanence. The approach to be taken when defining and reviewing Green Belt boundaries is explicit in paragraphs 83, 84 and 85.

In the present case, the Council appears to have disregarded national policy by generally proposing to take out of the Green Belt only the land predicted to be required in the present plan period and by defining weak new Green Belt boundaries in many instances.

This overlooks the intended permanence of Green Belt boundaries in the long-term in national policy. In potentially amending Green Belt boundaries in more cases than necessary it overlooks the national policy aim of promoting more sustainable patterns of development. Without any substantive justification, a strategic view on longer term requirements has not been taken in proposing amended Green Belt boundaries – a short term view relating to the present plan period alone appears to have been taken. Contrary to NPPF policy, the proposed new Green Belt boundaries have not been defined clearly using physical features that are readily recognisable and likely to be permanent (see, for example, the land west and east of the proposed Odd Down allocation or the land west and east of the proposed Weston allocation).

The November 2013 proposed Core Strategy changes have highlighted that the exercise of allocating land currently in the Green Belt for housing is one which needs to be undertaken much more thoroughly by the Council, starting with national policy requirements.

(b) The Council is Seeking to Act Contrary to its Own Strategy (and NPPF Policy) which Requires Development to Take

Place in the Most Sustainable Locations

It appears that more sustainable potential brownfield development sites are being identified and recognised in principle in the Council’s Strategic Housing Land Availability Assessment but that these are being omitted from the forecast housing land supply without sufficient scrutiny. This is important for many reasons - NPPF Green Belt policy, paragraph 84, regarding the promotion of sustainable patterns of development; the fundamental housing strategy of the draft Core Strategy (para 1.26) and national policy seeking to achieve sustainable development (NPPF paragraphs 6 – 16).

For example, land at Roseberry Place, Lower Bristol Road has been identified for many years as an important location for mixed use regeneration – in particular, housing and potentially employment uses – both in the adopted B&NES Local Plan and the draft Core Strategy, Policy B3 where it is recognised “a Key Regeneration Opportunity”. The site comprises part of Wes.5 and Wes.6 in the SHLAA, the November 2013 version of which identifies the potential for 95 dwellings, a high level of suitability and ready availability. The SHLAA indicates that development is expected within 10 years. However, the site has been omitted from the Council’s housing delivery trajectory.

In reality, the site is likely to produce more dwellings (as part of mixed use development) and to do so more quickly. Consultations with the Council and technical studies are leading to a planning application intended in the first half of 2014. The deliverability of the development (by the private sector without the need for public funds) has been emphasised. The scheme currently being worked up will produce at least 170 dwellings, starting within 5 years, and involves 7,000 sq m of employment space. (This potential was emphasised in the representations submitted by Deeley Freed on SPC74 in May 2013 and the associated more detailed comments on the SHLAA submitted to the Council at that time in respect of the Roseberry Place regeneration site).

**Change to the policy requested:**

Before taking land out of the Green Belt and defining new Green Belt boundaries, the recognised housing development potential of Roseberry Place and other such sites should first be taken into account in order to establish exactly how much housing is actually required on Green Belt sites.

Thereafter, any land taken out of the Green Belt should be done so in a manner which accords with national policy and new Green Belt boundaries should be defined on a long-term basis.

**Respondent Number:** 2564 **Comment Number:** 17 **Respondent Name:** **Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA20

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**

Support:

15. This amendment only identifies a few very large sites for development on the edge of Bath. It entirely fails to identify a mix and range of types and sizes of suitable and deliverable sites which could be released as allocations. Nowhere in the plan as it currently stands is there a policy or mechanism which sets out how suitable green belt sites on the edge of Bath have been or will be identified to meet the considerable housing need that exists within the City.

Non strategic green belt site allocations

16. There is no provision for sites on the edge of Bath to come forward for development. The Inspector in ID/40 recognised that these allocations might come forward in para 26-28. He expressed concern to ensure the proper assessment of non strategic green belt sites and the need for any links with the place making plan to be dealt with through work undertaken by the Council before the hearings. This issue is not addressed and resolved within the amendments. This is a major omission because highly accessible and sustainable sites in the green belt that could contribute to meeting the affordable housing need are not included in this plan. Because they are not strategic, they will not be included in the Placemaking Plan either, where only inner detailed boundaries to address anomalies will be considered. Consequently, there has been a failure of the plan process to adequately consider all available sites and the role they play in green belt

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

terms and assessment of whether medium sized sites exist which could be allocated for development. This assessment should have been properly undertaken if the core strategy is going to turn into an allocations plan, which it now appears to have become.

17. The morphing of the plan from a Core Strategy which contains no strategic sites, through to the identification of broad locations and now to green belt allocations, has not allowed interested parties the opportunity to put forward alternative sites. This is a fundamental failing of the plan making process in BANES. This process is unsound and the outcome is a plan which fails to have properly considered all reasonable alternatives and as such it fails the soundness test. The Inspectors suggestion of a non-strategic Green belt sites allocations allowance to be included in the planned delivery table at para 27 of ID40 is entirely appropriate and would ensure that these sites are identified in the Placemaking Plan.

**Change to the policy requested:**

**Respondent Number:** 4720 **Comment Number:** 1 **Respondent Name:**

**Respondent Organisation:** ProtectBath.org

**Agent ID:** 194 **Agent Name:** Harrison Grant

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA20

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**

**Support:**

We are instructed by ProtectBath.org and make this response on behalf of their 800+ members to the current Council consultation on releasing land in the Green Belt for development.

Our client does not believe that Green Belt land should be released.

We have not seen any evidence that the Council has adequately considered the alternatives, nor has the case been made for any of the individual sites.

The Council is basing their case for building on the Green Belt on the oversupply for market housing to meet a requirement of affordable housing. At no stage has the Council made it clear to the public that they were intending to deliver more houses than is actually required. This is not spelt out in the current consultation.

The Council have never really consulted on this issue and the public have never had the opportunity to consider the balance between oversupply and building on the Green Belt. This should be a matter that should be openly consulted on by the Council.

The Council has a number of choices which it should explore:

1. A higher percentage of affordable housing could be obtained .The Council has 'budgeted' for 30-40% affordable housing on new sites. We feel that given the demand from developers, the nature of land costs in BANES and the Council's belief that affordable housing is needed a higher percentage could (and should) be obtained. Just pushing that percentage up very slightly would mean no Green Belt would need to be built on.
2. The Council could and should be more robust in relation to a developer's claim on viability.
3. No real evidence has been produced as to the assessment the Council has undertaken of alternative (non Green Belt) sites that could be brought forward. This is particularly the case on brownfield sites where it may be possible to obtain a higher percentage of affordable housing either by negotiating with the developer or the Council providing the land itself.
4. A rigorous policy of 'brownfield first' should be adopted ensuring that the redevelopment of brownfield sites takes place before the release of any Green Belt land is considered.

5. The Council do not appear to have carried out any form of a cost benefit analysis of building on the Green Belt -v- the over provision of housing supply -v- the need for affordable housing. This should be provided and consulted on.

6. Approaching and working closely with neighbouring commuter towns to ascertain what availability they have and undertake an assessment with them. This obligation is contained within the 'duty to cooperate' which has not been adequately undertaken by the Council.

The Council need to recognise that the Green Belt performs a number of essential functions and should be protected. The allocation of Green Belt land for development outweighs any of the benefits outlined by the Council due to the nature and setting of the Green Belt in Bath.

This land performs an essential part of the World Heritage Site setting and should be retained for the benefit of future generations.

**Change to the policy requested:**

**Respondent Number:** 4803 **Comment Number:** 7 **Respondent Name:** Simon Steel-Perkins **Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA20

**Location:**

**Comment made on the Proposed Change:**

**Support:**

15. This amendment only identifies a few very large sites for development on the edge of Bath. It entirely fails to identify a mix and range of types and sizes of suitable and deliverable sites which could be released as allocations. Nowhere in the plan as it currently stands is there a policy or mechanism which sets out how suitable green belt sites on the edge of Bath have been or will be identified to meet the considerable housing need that exists within the City.

Non strategic green belt site allocations

16. There is no provision for sites on the edge of Bath to come forward for development. The Inspector in ID/40 recognised that these allocations might come forward in para 26-28. He expressed concern to ensure the proper assessment of non strategic green belt sites and the need for any links with the place making plan to be dealt with through work undertaken by the Council before the hearings. This issue is not addressed and resolved within the amendments. This is a major omission because highly accessible and sustainable sites in the green belt that could contribute to meeting the affordable housing need are not included in this plan. Because they are not strategic, they will not be included in the Placemaking Plan either, where only inner detailed boundaries to address anomalies will be considered. Consequently, there has been a failure of the plan process to adequately consider all available sites and the role they play in green belt terms and assessment of whether medium sized sites exist which could be allocated for development. This assessment should have been properly undertaken if the core strategy is going to turn into an allocations plan, which it now appears to have become.

17. The morphing of the plan from a Core Strategy which contains no strategic sites, through to the identification of broad locations and now to green belt allocations, has not allowed interested parties the opportunity to put forward alternative sites. This is a fundamental failing of the plan making process in BANES. This process is unsound and the outcome is a plan which fails to have properly considered all reasonable alternatives and as such it fails the soundness test. The Inspectors suggestion of a non-strategic Green belt sites allocations allowance to be included in the planned delivery table at para 27 of ID40 is entirely appropriate and would ensure that these sites are identified in the Placemaking Plan.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

**Respondent Number:** 5024 **Comment Number:** 4 **Respondent Name:** Adrian Shields

**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA20**Location:****Comment made on the Proposed Change:**Support: 

Green Belt/AONB

Building in the Green Belt , AONB , setting of the world heritage site and adjacent to the Wansdyke is wrong and contravenes even the latest National Planning Policy Framework unless 'exceptional circumstances' can be proved to exist, or in the case of Heritage assets ( Scheduled Ancient Monuments) "wholly exceptional circumstances"  
Reference CSA/7 . CSA/10 , CSA/17 , CSA/20 , CSA/21 , CSA / 22 and CSA/23 . BANES Policy B3a &NPFF clauses 79 - 88

**Change to the policy requested:**

**Respondent Number:** 5106 **Comment Number:** 1 **Respondent Name:** Andrew Twelves

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA20**Location:****Comment made on the Proposed Change:**Support: 

In my view there is a problem with the current consultation in that although no decision has yet been made on the principle of Green Belt boundary change the public are being asked to accept a document that states that it has. Just as the Inspector decided that he needed more information before he could reach a decision, so the public should be afforded the right to comment on the principle in the light of the additional information now available.

My views,for what they are worth, are as follows.

- 1, The need to strictly limit development in Bath was accepted for many years. It was accepted that developable land was a finite resource and Bath was exempted from the requirement to identify a five year supply of housing land (fully endorsed by Central Government). The Bath Manifesto stated that development should be better controlled than had been possible prior to the WHS designation.
2. Bath is now seen as the focus for development in the area but many maintain that the pendulum has already swung too far and that the development potential of identified brownfield sites is excessive especially in the context of ever increasing student and tourist numbers and infrastructure limitations. The 2010 version of the Core Strategy found no exceptional circumstances to justify Green Belt or AONB development
3. It is not too late to restore Bath's special status but if greenfield development is to be imposed on the City we should go back to the 2009 Strategic Options document which made a strong case for retaining the Green Belt and AONB protection of Bath's green hillsides.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

Change to the policy requested:

Respondent Number: 5113 Comment Number: 1 Respondent Name: Dr. Shepherd

Respondent Organisation:

Agent ID: Agent Name:

Further Information available in the original comment?  Attachments sent with the comment? 

Change Reference: CSA20

Location:

Comment made on the Proposed Change:

Support: 

CSA.20 and CSA 21 The Green belt status should be maintained to protect the character of both local villages and Bath itself. – as is the whole purpose of green belts.

Change to the policy requested:

Respondent Number: 5130 Comment Number: 1 Respondent Name: Kenneth McKelvey

Respondent Organisation:

Agent ID: Agent Name:

Further Information available in the original comment?  Attachments sent with the comment? 

Change Reference: CSA20

Location:

Comment made on the Proposed Change:

Support: 

My first comment is that taking land out of the Green Belt around Bath makes no sense for economic reasons. Bath is not just “any UK city”. Bath is not, say, Milton Keynes. Bath is one of Britain’s World Heritage Sites and one of only two World Heritage Cities anywhere in the world, the other being Venice. Bath’s Green Belt performs the function of a buffer zone as required around World Heritage Sites. Reducing the Green Belt around Bath can only serve to reduce its exceptional characteristics. Those characteristics support Bath’s exceptional status and hence directly support tourism and the commerce that comes with it, both directly around Bath and indirectly in attracting tourists to the UK in general. Risking those characteristics makes no sense if it can be avoided.

Change to the policy requested:

**Change Reference: CSA21**

Respondent Number: 246 Comment Number: 11 Respondent Name:

Respondent Organisation: Combe Hay Parish Council

Agent ID: Agent Name:

Further Information available in the original comment?  Attachments sent with the comment? 

Change Reference: CSA21

Location: Land adjoining Odd Down

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

**Change to the policy requested:**

Delete "Odd Down".

**Respondent Number:** 1525 **Comment Number:** 2 **Respondent Name:****Respondent Organisation:** South Stoke Parish Council**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA21**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

CSA/21 Draws attention to the need to take a long term view when considering changes to Green Belt Boundaries. It goes on to say that "Environmental sensitivity and the need to minimise harm means that there is no scope to identify safeguarded land for the longer term."

The 'Concept diagram' Annex 1, CSA/23 and the 'Revised Green Belt Boundary map' Annex 2, CSA/24 then define an area to be removed from the Green Belt which is at least twice the area of the existing Sulis Meadows estate where 369 houses exist at a density of less than 30/hectare.

South Stoke Parish Council believes that this is effectively 'safeguarding' this land for future higher density development, well in excess of the now planned 300 units. This amendment is therefore inconsistent with Government policy and its inclusion makes the Core Strategy unsound.

**Change to the policy requested:**

South Stoke Parish Council accepts that if it can be proven that part of the Plateau Land should be removed from the Green Belt to provide the necessary Affordable Houses and that this is essential for the long term future of the District (a point which we will dispute), then due to "Environmental sensitivity and the need to minimise harm" the area to be removed should be sufficient for up to 300 houses and no more.

The amendment CSA/21 should be revised to make this absolutely clear, or the numbers on this 'Concept' zone will soon increase to 700 or more units at 35/40 per hectare.

**Respondent Number:** 5024 **Comment Number:** 3 **Respondent Name:** Adrian Shields**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA21**Location:****Comment made on the Proposed Change:**Support: 

Green Belt/AONB

Building in the Green Belt , AONB , setting of the world heritage site and adjacent to the Wansdyke is wrong and contravenes even the latest National Planning Policy Framework unless 'exceptional circumstances' can be proved to exist, or in the case of Heritage assets ( Scheduled Ancient Monuments) "wholly exceptional circumstances"  
Reference CSA/7 . CSA/10 , CSA/17 , CSA/20 , CSA/21 , CSA / 22 and CSA/23 . BANES Policy B3a &NPFF clauses 79 - 88

Change to the policy requested:

**Change Reference: CSA22 Land adjoining Odd Down**

**Respondent Number:** 28    **Comment Number:** 1    **Respondent Name:**    **Respondent Organisation:** Horseworld

**Agent ID:** 123    **Agent Name:** Savills

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

Support:

These Representations are submitted by Savills on behalf of HorseWorld in response to the consultation on the ‘Schedule of Core Strategy Amendments’ (November 2013).

Savills has represented HorseWorld throughout the preparation of the Core Strategy and responded through representations to previous consultation stages. We have also appeared at the Examination to support our objection to the strategic housing requirement. The latest consultation on the Core Strategy Amendments includes the release of land within HorseWorld’s ownership from the Green Belt and its allocation for housing. These representations support the extent of the proposed allocation and provisions of the proposed wording for Policy RA5, save for two specific objections.

These representations address three separate but related matters. The subsequent section provides a brief summary of the recent planning history on the site. Following this is an explanation of the reasons why the principle of development is considered acceptable and proposed realignment of the Green Belt boundary and allocation of land in this location is considered suitable, sustainable and deliverable. We then provide specific comments relating to the proposed wording of Policy RA5, including an explanation of the elements we support and why, and the two areas of outstanding objections.

**Planning History**

A hybrid planning application and listed building consent application were submitted in June 2012 for the redevelopment of the existing HorseWorld Visitor Centre site to provide up to 125 residential dwellings. This includes seven dwellings within the converted curtilage listed buildings and a further 118 new build properties.

The application was tied to a separate full planning application for the construction of a new Visitor Centre on adjacent land within HorseWorld control a short distance to the east. It was HorseWorld’s intention that the residential development would ‘enable’ the delivery of the new Visitor Centre and in so doing support the long term financial sustainability of the Charity in the face of significant decreases in charitable giving and legacy donations.

The long term preservation of the Visitor Centre within Whitchurch would also protect 62 jobs in the local area which HorseWorld currently supports and would ensure its continuing involvement in equine welfare, the education of young people with learning difficulties, support for educational institutions and the training of the emergency services in animal welfare.

Despite the officer recommendation for approval (see Appendix 1) of the planning application on the basis that ‘Very Special Circumstances’ were demonstrated, the Council’s Planning Committee determined to refuse the planning applications.

In relation to the proposed allocation, it is particularly important to note that all technical matters relating to highways access and impact, landscape and visual impact, ecology, flood risk and drainage etc were addressed through the submission of detailed technical reports, all of which have been signed off by the relevant Statutory Consultees and internal departments within B&NES Council.

In addition, the Business Plan and Viability Assessment which support the application was scrutinised and assessed by independent consultants advising the Council. With the benefit of their input the Council Officers were convinced that the proposed new visitor centre would provide a sound financial basis for the charity into the future and enable to the charity to continue it's good work. The technical information submitted and approved clearly demonstrates the suitability of the site for development and confirms that there are no technical planning reasons why the site cannot deliver the scale of development proposed. The refusal of the planning application on the land within the proposed Policy RA1 allocation should not therefore be misconstrued as implying that there are reasons to suggest that the site is not either suitable or deliverable.

#### The Principle of Development

In principle we strongly support the proposed allocation at Whitchurch. Not only is the delivery of new development at Whitchurch entirely suitable and appropriate, but also the proposed land release from the Green Belt and allocation are, in our view, the most appropriate location within Whitchurch.

There are a number of settlements within the B&NES administrative area with Bath clearly at the centre. There is a clear logic to locating the majority of growth within and on the edge of the Bath urban area, however, there are also strong grounds to locate a proportion of the future housing growth within and adjacent to other settlements.

In distributing the growth, it is imperative that the Council recognise the spatial context of the District including, most importantly, the proximity of the Bristol urban area to the North West. The proximity of Whitchurch to Bristol and the scale and range of services and facilities available within the City cannot be ignored in framing the spatial strategy.

Within Whitchurch itself, the Council considered a number of options for development through the detailed evidence based documents. The analysis of the landscape and visual impacts, historic buildings and archaeology and ecology all support the allocation of the land proposed within Policy RA1 as the preferred location for the 200 dwellings development.

This evidence is further supplemented by the technical studies produced by HorseWorld in support of the planning application. Whilst these studies do not provide a comparative analysis of these technical matters, they do include an additional detailed assessment of key considerations which demonstrate the site is suitable and deliverable. The following are of particular note:

- **Archaeology and Cultural Heritage:** A detailed desk based and intrusive survey has been undertaken of the site in accordance with a scope of works agreed with the Conservation Officer at B&NES. This survey, a copy of which is attached at Appendix 2, provides all the certainty necessary that is required for the grant of planning permission. In addition, assessment of the Listed Building and Curtilage Listed Buildings on the application site demonstrate that, through a carefully managed design and subsequent Hybrid planning application, that the presence of the Listed Buildings is not a reason to believe the site is undeliverable. Indeed, the masterplan demonstrates that the historic assets can be carefully and thoughtfully integrated into the future redevelopment of the site and their setting indeed enhanced through that process.
- **Transport Assessment:** The HorseWorld application was supported by a Transport Assessment which confirmed that the implications of a 125 dwelling development could be accommodated within the highway network. Furthermore, it also assessed the highways access arrangements proposed through Policy RA1 for the site, which include a main entrance onto Staunton Land and a separate, secondary entrance/exit onto Sleep Lane. A copy of the full Transport Assessment is available if requested, however, this is a substantial document and it is not considered appropriate to append it to these Representations. We have however attached at Appendix 3 comments from the Highway Officer confirming the acceptability of the information submitted and the conclusions it reaches on highways grounds.
- **Landscape and Visual Assessment:** The Landscape and Visual Impact Assessment (LVIA) produced by the Cooper Partnership in support of the planning applications is attached at Appendix 4. The detailed assessment of the zone of visibility shows how contained the site is within the topography of the area and the current field boundaries. The report substantiates the Council's conclusions that the land proposed for allocation will have a limited landscape and visual impact.
- **Technical Studies:** Further technical studies relating to matters such as Flood Risk and Drainage were also submitted alongside the planning application. These can be made available if required, however, no objections were raised on these matters through the planning application process, as confirmed by the Officer's Report to Planning Committee, attached at Appendix 1.

The full suite of evidence available demonstrates beyond all doubt that the application site is both suitable and

deliverable. There are no technical, environmental, ownership or constraints to its development and we are confident it could be delivered in line with the housing trajectory proposed by the Council, if not sooner.

#### Policy RA5

We generally support the majority of the provisions within the proposed wording for Policy RA5. For the reasons set out above, clearly the matters relating to the principle and extent of the allocation are supported; it is just two of the detailed Placemaking Principles which are considered unjustified and unnecessary. The two areas of objection relate to the requirement for 40% affordable housing (Placemaking Principle 3) and the specification of Code Level 5 from 2014 (Placemaking Principle 9). We now address these two matters in turn:

#### Placemaking Principle 3 – Affordable Housing

There is no justification for nor evidence which supports the proposed requirement for 40% affordable housing on the land proposed for allocation through Policy RA5.

Policy CP9 (Affordable Housing) of the emerging Core Strategy sets two differential affordable housing zones for the Authority area. The first, which covers the area within prime Bath, Bath North and East and Bath Rural Hinterland requires 40% affordable housing, whereas within the remaining areas in the Authority, the policy seeks 30% affordable housing.

The differential rates in the policy are predicated upon evidence produced by Andrew Golland Associates on behalf of the Council entitled 'A Viability Study Update' (December 2012). Given the variation in values across the Authority, the Study suggests one option is to separate the affordable housing target based on location (see Paragraph 6.4).

The provisions of Policy CP9 are therefore consistent with the evidence, however, the affordable housing target for the land at Whitchurch in Policy RA5 is neither internally consistent with the over-arching policy (CP9) nor with the viability evidence produced by the Council. The latter renders the policy requirement inconsistent with the provisions of Paragraph 173 of the NPPF and therefore unsound. Given that the evidence base proposed 30% affordable housing in the 'Keynsham and Saltford' sub- area it is relatively straightforward to address the unsoundness of the Plan. Indeed, a change from the 40% affordable housing to 30% affordable housing would ensure consistency between the policy requirement and the evidence base, thus overcoming this objection.

#### Placemaking Principle 9 – Sustainable Construction

Placemaking Principle 9 proposes that all new housing must meet Code for Sustainable Home Level 5 from 2014 or its successor. No evidence is provided in support of the policy position nor is there any explanation why the Council deem it appropriate to deviate from the requirements of Core Strategy Policy CP2.

The Code for Sustainable Homes was developed between the development industry and Government to establish a timetable for enhanced sustainability in housing which could at that time be achieved without harming the delivery of housing. It has since been the subject of considerable debate and a Government consultation on changes to the future standards. Various cost studies and practical examples have demonstrated that the cost of achieving the higher Code Levels, particularly the step up to Code Levels 5 and 6, have a significant bearing upon build costs and consequently financial viability.

The actual impact on financial viability at the local level is however unknown as the evidence to test this has not been produced. In the absence of any evidence to demonstrate that the requirement for a higher sustainability standard on the land at Odd Down is either appropriate or viable, it cannot be sustained through the provisions of Policy RA5.

Indeed, to establish a policy requirement which exceeds the Government standards has the potential to put in jeopardy the delivery of residential development. It is for this reason that the NPPF guards against such an approach. Paragraph 95 states that:

"To support the move to a low carbon future, local planning authorities should: ... when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards."

There is no justification or indeed evidence to support an alternative local standards on specific allocation sites within the emerging Core Strategy. Indeed, to do so is inconsistent with the requirements of the NPPF. We therefore recommend that this Placemaking Principle is amended to make reference to the latest national standard.

**Conclusion**

HorseWorld strongly support the principle and location of the proposed 200 dwelling allocation at Whitchurch through the changes to Policy RA5. The area identified is entirely suitable and deliverable and in our view represents the most appropriate location for development at Whitchurch.

We do however object to two of the Placemaking Principles proposed in Policy RA5. There is no supporting evidence or justification for the affordable housing policy target or sustainability requirements associated with the allocation of land at Whitchurch. In order to ensure consistency within the Plan and with the evidence, we strongly recommend that both of these Placemaking Principles are changed to reflect the policy provisions of CP2 and CP9 which are based upon the available evidence.

**Change to the policy requested:**

**Respondent Number:** 67

**Comment Number:** 1

**Respondent Name:** Trevor John

**Respondent Organisation:**

**Agent ID:**            **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:**

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I disagree with the proposed release of Green Belt land and maintain that this release will make the Core Strategy unsound, as it is contrary to national policy laid out in the NPPF (particularly paragraphs 80, 115 and 116). In particular, B&NES have not given proper consideration to:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

This land should remain as Green Belt/AONB:

- to check the unrestricted sprawl of Bath;
- to assist in safeguarding the countryside from encroachment by Bath;
- to preserve the setting and special character of historic towns (both Bath and South Stoke); and
- to assist in urban regeneration, by encouraging the recycling of brownfield land and other urban land in Bath
- to help in the conservation of wildlife and cultural heritage.

Virtually all of this land is Green Belt, AONB, part of the setting for the World Heritage site and should be the buffer for that site, and should also be preserved in order to protect heritage assets and its ecology.

The Arup report headed “Bath & North East Somerset Green Belt Review/Stage 2 Report” (which report I will refer to as Arup2) commented on this site and I will refer below to the Cells that were set out in Appendix B1 of that report. My specific comments are:

- (A) That report, on pages 9 to 11, sets out the impact of development in the 6 cells concerned and says of each one:
- Cell A Little overall impact and “this land cell may be a preferred area for release”.
  - Cells B “The WHS Setting and AONB LVIA report advises that development of any kind in the southern half and western part of these land cells would be highly detrimental to maintaining the hidden nature of the city. Development in the southern and western part of the cells could therefore result in a comparatively greater sense of encroachment into the countryside.” Although not mentioned by Arup2, the WHS Setting/AONB Assessment Report also says about this Cell: “built development would have an unacceptable impact on the WHS Setting and AONB combined, which could not be

successfully mitigated". The Heritage Asset Report ("HAR") has also reviewed the site and the table A3.6 in Appendix 3 says that there is high risk of damage in the southern part of this Cell and medium risk in the North. Why then have B&NES allocated virtually all of Cell B for release? It should remain in the Green Belt and could provide a good site for a relocated football ground, virtually adjoining the Park & Ride - see Core Strategy amendments (ref CSA22/10(b)).

- Cell C "the WHS and AONB LVIA advises that the northern part of the land cells are not as sensitive with respect to the setting of the Cross Keys Inn listed building or WHS setting, but that development in the southern parts of these land cells would be highly detrimental to maintaining the hidden nature of the city. Development within land cells C1 & C2 would reduce the separation between the City of Bath and South Stoke Village and Conservation Area"

Again, the HAR report has also reviewed this Cell and the table A3.6 says that there is high risk of damage in the southern part of this Cell and medium risk in the North. Why then have B&NES allocated virtually all of Cell C for release? Even more strangely, why do the Core Strategy amendments (ref CSA22/9) say that "The Provision of additional local employment will be supported at Manor Farm, through conversion and redevelopment" and the revised plan (Annex 1, page 57 to the amendments, headed "Strategic Green Belt Site allocation (November 2013)", show Manor Farm buildings shaded in Brown as though they are a strategic site? What has this amendment got to do with housing delivery and removing land from the Green Belt? This site is in the Green Belt, the AONB and is right on the skyline. More importantly, a major part is the old village cricket pitch and is undeveloped and immediately adjoining Cell C South, and, as mentioned above, any development at the southern end of land cell C would be highly detrimental to maintaining the hidden nature of the city of Bath. Any development of the old farm buildings should be limited to any buildings that "are of permanent and substantial construction" (NPPF 90), most if not all of which have already been converted to offices. Development may need to be further limited to avoid the need to upgrade South Stoke Lane and the road into the site.

- Cell D The WHS and AONB LVIA advises that development in this land cells is unlikely to be detrimental to maintaining the hidden city or reducing the open view from Cross Keys too much. BUT, the HAR report says that development of this Cell would create a high risk of damage to the setting of the Wansdyke.

- Cell E "The Green Belt gap between Bath and South Stoke is very narrow in this area, to the extent that even relatively limited developments could threaten coalescence of the village with the large built up area." and "The WHS and AONB LVIA advises that this land cell contributes to the understanding of Georgian routes as it is one of the few remaining open views across the "Down" from Midford Road and Cross Keys" and "Development within land cell E would potentially result in development along both sides of Southstoke Lane and mark a substantial change in the width of the remaining Green Belt gap between the built-up area of Bath and the village of South Stoke." So I am pleased to see that Cell E will remain in the Green Belt but how then can B&NES possibly suggest that Southstoke Lane, which borders Cell E be widened?

- Cell F "The WHS Setting and AONB LVIA report advises that development within land cell F would be highly detrimental to maintaining the hidden nature of the city of Bath." and "Land cell adjoins the historic core of South Stoke and therefore the Green Belt in this area is considered to be of particular importance for protecting the separate identity and setting of the village, which is also a designated Conservation Area." How then can B&NES possibly suggest that Southstoke Lane, which borders Cell F, be widened and a new access road is improved/built along the southern border of Cell F and Cell C, when any development would be "highly detrimental"? The Core Strategy amendments (ref CSA22/5) correctly state that the Core Strategy will avoid or minimise detrimental impacts on "The character of South Stoke and Combe Hay lanes", so it's completely illogical to then say (ref CSA22/7) that "There is potential vehicle access to the site from South Stoke Lane which would necessitate upgrading the Cross Keys junction". This lane is very narrow and it is impossible to see how it can be upgraded without changing its character, impacting on Cells E & F, on South Stoke Village and its conservation area, and similarly any upgrade of the Cross Keys junction would be completely contrary to the advice from Arups on Cell E.

(B) If houses really are needed at this location, another Arup's report (dated April 2013 and headed "Land Adjoining Odd Down, Development Concept Options Report") suggests that Plot A could accommodate 84 dwellings, so the remainder of the land is being taken out of the Green Belt in order to provide only 216 dwellings. In fact the latest figures from B&NES show that enough market houses can be provided elsewhere in the area and this site is only being released in order to entice landowners/developers to make up a shortfall of 355 affordable homes. Why then cannot Plot A be allocated entirely to affordable homes, and the football club enticed to agree by the provision of a modern ground/facilities on land adjoining the Park & Ride?

© The proposed land will also include areas in Cells B, C & D that will not be built on initially but will be taken out of the Green Belt and therefore susceptible to development "creep" in later years. This does not comply with para 80 of the NPPF, where B&NES should be using the Green Belt to "check the unrestricted sprawl" of Bath.

(D) The land is also used as a foraging area for protected bats and is a breeding ground for skylarks. Even if areas of the land are left undeveloped, the associated noise, light pollution etc from the development would have a seriously detrimental effect on the wildlife.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****CONCLUSION**

The whole of this plateau is described in Arup2 as: “The Green Belt designation in this land parcel is of high importance for preventing the sprawl of Bath into open countryside that could also result in the coalescence of the city with the villages of South Stoke and Combe Hay.” And “The Green Belt designation within this land parcel also serves the purposes of protecting the countryside from encroachment, assisting urban regeneration and preserving the special character of the Bath World Heritage Site. Under local purpose 6, the Green Belt helps to preserve the identity and settings of South Stoke and Combe Hay. Notable positive uses of the Green Belt in this land parcel include preserving the setting of the South Stoke and Combe Hay Conservation Areas; and the protection of Sites of Nature Conservation Interest and a good network of Public Rights of Way.” So B&NES’ own advisors admit that preserving the Green Belt designation in this land parcel is of high importance. Also, all of the plateau around South Stoke is part of the Cotswolds AONB and so major developments can only take place in “exceptional circumstances” and if they are in the “public interest” (NPPF para 116). Building dwellings on this land in order to provide a small number of affordable homes should not be allowed, as B&NES have not given adequate consideration to “the scope for, developing elsewhere outside the designated area”, so the very low proposed density on brownfield sites in Bath needs to be increased to at least 40dph and alternative sites explored, possibly in neighbouring authorities. If it is concluded that dwellings are still needed here, they should be limited to Cell A, with access only from the West. Any development at Manor Farm should comply with the NPPF rules for developments in an AONB and be very limited, so that new roads/junctions/widening etc are not needed in the East of the site.

Overall, I feel that a Core Strategy including these amendments as proposed by B&NES will not be sound, as it will not be justified and will not be consistent with national policy for amendments to Green Belts and developments in an AONB.

**Change to the policy requested:**

The Green Belt boundary at Odd Down/South Stoke should remain where it is and development should be limited to the Odd Down FC

**Respondent Number:** 93      **Comment Number:** 2      **Respondent Name:** Highways Agency      **Respondent Organisation:**

**Agent ID:**      **Agent Name:**

**Further Information available in the original comment?**       **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

The site-specific placemaking principles in respect of transport are broadly supported. The Agency considers that the potential vehicle access leading east to Southstoke Lane is particularly important to give the opportunity for through routes for bus services. Without this the development will be, in effect, a large cui-de-sac, meaning that bus operators incur a time penalty as services retrace their steps back to the A367.

In terms of access, the proposed employment appears to be particularly poorly related to the rest of the strategic site allocation and to Bath in general. The Agency considers this land use should be located to the west of the site, in order that it is close to the park and ride site and bus services on the A367, and therefore ensuring non-car access is maximised for future employees and visitors.

**Change to the policy requested:**

**Respondent Number:** 95      **Comment Number:** 1      **Respondent Name:** Mr Phil Turton      **Respondent Organisation:**

**Agent ID:**      **Agent Name:**

**Further Information available in the original comment?**       **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

For the reasons summarised below I do not support amendment CSA22 to the Core Strategy which proposes that land between Odd Down, Combe Down and South Stoke is removed from the Green Belt and allocated for residential development and associated infrastructure.

Retention of the land's green belt status is fully in accordance with the NPPF's guidance whilst the consequences of the amendment directly contradict all five stated purposes of including land within the green belt as specified in the NPPF. Encroaching on the countryside, the proposed amendment will facilitate the sprawl of the large build up area of Bath, resulting in the neighbouring settlements of Combe Down and South Stoke merging into one another seriously damaging the setting and special character of the currently separate South Stoke village. It is also difficult to see how release of such a level, green field site on the edge of the city will assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The amendment is entirely contrary to the relevant planning guidance with respect to green belt designations and should therefore be withdrawn.

The NPPF, with reference to Circular 06/2005, PPS9 and Section 74(2) of the Countryside and Rights of Way Act 2000 provides clear guidance in respect of statutory obligations for biodiversity and stipulates that planning authorities should conserve and enhance biodiversity and that if significant harm resulting from a development cannot be avoided then planning permission should be refused. PPS9 is more specific, requiring that species identified as being of principal importance for the conservation of biodiversity in England are protected from the adverse effects of development. The area of covered by the amendment is a foraging area for *Rhinolophus ferrumequinum* the greater horseshoe bat and habitat for *Alauda arvensis* the skylark. Both species are identified as being of principal importance for the conservation of biological diversity in England, in accordance with the 1992 UN Convention on Biological Diversity (Section 74(2) of the Countryside and Rights of Way Act 2000). In contradiction of these planning principles and guidance, the amendment will result in the destruction of this habitat and should therefore be withdrawn.

The area of the amendment lies within the Cotswold AONB and abuts a scheduled section of the Wansdyke ancient monument (NHLE No.: 1007003: Wansdyke: section 1230yds (1120m) eastwards from Burnt House Inn) the Bath World Heritage Site and the South Stoke conservation area. The NPPF is clear that planning permission should be refused for major developments in AONBs except in exceptional circumstances and where it can be demonstrated they are in the public interest. The NPPF is similarly clear when considering the impact of proposed development on the significance of designated heritage assets which can be harmed or lost through development within their settings. Harm to heritage assets of the highest significance, notably scheduled monuments and world heritage sites, should be wholly exceptional; local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits. The key public benefit derived from releasing land from the current green belt is to meet the demand for housing within the BANES area. BANES has estimated that 5,437 market-value and 3,290 affordable homes will need to be built by 2029 so it can meet the demand from a growing population. BANES have stated publicly that on the basis of these estimates there would be no need to develop on the green belt. BANES has now earmarked sites for 9,646 market-value properties, taking the overall total up to 12,956 – around 4,200 more than the council admits it needs. This increase is not to derive greater public benefit but to increase the ratio of market to affordable housing to level more favourable to developers delivering affordable housing under a market housing scheme. In accordance with the planning guidance related to the historic environment the amendment can't be justified and should be withdrawn.

At a time when there are more than 500 empty homes across Bath and north east Somerset, rather than proposing building 900 homes in the green belt the Core Strategy should challenge developer affordable-to-market housing ratios and foster innovative schemes which deliver the required number of affordable houses without the need to diminish the area of green belt.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 177 **Comment Number:** 1 **Respondent Name:** Derek G Satow**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

1. The comments I submitted on 1 May 2013 in response to the previous consultation (May 2013) remain wholly applicable in this case, subject to the following additional points.
2. The amount of house building proposed within the AONB is contrary to the NPPF unless it can be justified for exceptional circumstances for both local and national reasons. The Council does not appear to explain any such reasons.
3. Bearing in mind that the Green Belt is intended to be a long life protective designation, the area to be removed from it is far in excess of what is required.
4. The provision that the Council will preserve the individual character, identity and setting of the villages and hamlets within the Green Belt (table 8, clause 6 in draft Core Strategy) is of vital importance in this area for the prevention of coalescence between Bath and South Stoke, and must be retained.
5. The South Stoke Conservation Area was originally designated by Wansdyke Council in 1982. A reappraisal has evidently been carried out and completed in recent years, but not presented to the Council for adoption. The EiP should have the benefit of the most up to date material available.

**Change to the policy requested:****Respondent Number:** 199 **Comment Number:** 1 **Respondent Name:** Michael and Beatrice Godwin**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

We wish to protest about the planned building of 300 houses on the Green Belt, the Area of Outstanding Natural Beauty at South Stoke Plateau, adjacent to the Wansdyke scheduled ancient monument. The National Planning Policy Framework (published March 2012) recommends that such development should only take place in "wholly exceptional" circumstances (para 132).

Bath is surely a wholly exceptional case: it has been designated as UNESCO World Heritage Site (WHS) surrounded by irreplaceable ecological assets. Landscape protection is both a UK government national requirement and a UNESCO international requirement - the rural setting of the World Heritage Site is an essential part of the UNESCO listing. The area has been part of the Cotswold Area of Outstanding Natural Beauty since the Cotswolds Area of Outstanding Natural Beauty (Designation) Variation Order 1989 was confirmed by the Secretary of State on 21 December 1990.

The underlying oolitic limestone of the plateau makes it physically, topographically and geologically part of the Cotswolds. The impact on views in and views out of the Conservation Area would have a disastrous effect on the setting of the World Heritage Site. We find it hard to believe that adequate measures could be taken to reduce the visual impact on a

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

development of this size.

The plan completely ignores the UNESCO recommendation that there should be a clear Buffer Zone of unspoilt countryside between the World Heritage City of Bath and the surrounding villages - at one point (labelled 'Potential Access from South Stoke Lane') the plan envisages the City of Bath encroaching to no more than 100 yards from the village of South Stoke. The council's argument that a Buffer Zone is unnecessary because the land is protected by the Green Belt and AONB is absurd if this 'protection' can be overridden simply by rewriting the local plan. South Stoke is a unique community in a rural area; a development which envisages high-density housing would ruin the special quality of the village. This encroachment would virtually swallow the separate conservation village of South Stoke and digest it as a suburb of Bath.

The area around the village of South Stoke currently benefits from glorious dark skies which will be invisible in the glare of street lights. The plateau is a haven and foraging area for skylarks (Schedule of Core Strategy Amendments, 11 November 2013, p18) and greater horseshoe bats, which are an endangered species (Schedule of Core Strategy Amendments, 11 November 2013, p25) and other wildlife. It is hard to believe that the noise and light from a 300 house building development would not frighten away these increasingly threatened birds and mammals which are protected under the European Convention on Rare Species.

The Wansdyke scheduled ancient monument has been a boundary marker since the Angles and Saxons invaded in the 6th and 7th Centuries - the section adjoining Midford Road (<http://list.english-heritage.org.uk/resultsingle.aspx?uid=1007003>) has been allowed to deteriorate, but is still a clear dividing ditch between the urbanised city and the countryside which ought to be restored sensitively, rather than built over.

Transport links to the area are quite limited; we have lived at Malvern House, 152 Midford Road for more than 12 years, during which the volume of traffic on the 83110 has increased vastly in volume, particularly after 2008 closure of the A36 - and we read this week that there will be yet another long closure of the A36 in 2014, which will inevitably lead to more traffic clogging up the 83110. There is a weight limit on the 83110 which would also restrict access to the proposed development.

If South Stoke Lane becomes an access point for 300 new houses the amount of traffic on the 83110 is bound to increase substantially, to the detriment of the local environment. (Schedule of Core Strategy Amendments; 11 November 2013, p21-22). South Stoke Lane would have its character changed to become another busy B road with white lines and street lighting. The junction at the Cross Keys is liable to become an accident-prone bottleneck like the dual mini-roundabout at the junction of Midford Road and Bradford Road. Even the other envisaged access point from the A367 is quite restricted as the A367 is single carriageway on the south side of the Red Lion roundabout.

The policy of the council has long been to give priority to developing brownfield land before considering greenfield sites (e.g. 1998 Structure Plan; PR 565, 15 Jan 2002). An interview with David Batho in the Bath Chronicle (p5, 28111 November 2013) states that the required number of houses has been overstated by 4,200: "It is demonstrably clear that B&NES housing needs can be met without building a single house in the green belt".

**Change to the policy requested:**

**Respondent Number:** 246

**Comment Number:** 1

**Respondent Name:**

**Respondent Organisation:** Combe Hay Parish Council

**Agent ID:**            **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

1. In the current Core Strategy proposals, additional market homes are most significantly over-provisioned – apparently solely in order to enhance the commercial viability of the proposed developments with their stipulated proportions of affordable homes.

2. The land is entirely within the Bristol and Bath Green Belt – its designation is intended to prevent the sprawl of the City of Bath out into the open countryside – Policy B3A contravenes NPPF paragraphs 14, 17 and 79 to 92 – and also flies in the face of recent statements made by the Secretary of State for Communities and Local Government.
3. The land is entirely within the Cotswolds Area of Outstanding Natural Beauty – Policy B3A contravenes NPPF paragraphs 14, 115 and 116 - and also flies in the face of recent statements made by the Secretary of State for Communities and Local Government.
4. The land is currently committed to the production of food – see NPPF paragraphs 112 and 161.
5. The land is entirely a “green field” site – Policy B3A flies in the face of the national policy of “brownfield FIRST”.
6. The land forms a most valuable part of the Setting of the City of Bath World Heritage Site – the Supplementary Planning Guidance for which was very approved by B&NES Council – UNESCO also requires a World Heritage Site to have a “buffer zone” – see NPPF paragraphs 132, 137 and 138.
7. There are identified archaeological remains under the land – see NPPF paragraphs 128, 139 and 169.
8. Building on the land would most severely prejudice The Wansdyke Scheduled Ancient Monument.
9. Building on the land would greatly harm its biodiversity, in particular the foraging bat population (especially the protected Greater Horseshoe Bats) and the numerous Skylarks, which breed on the plateau – see NPPF paragraphs 7, 9, 17, 109, 113, 114, 117, 118 and 166.
10. Building on the land (and the lighting of buildings and streets) would have a very harmful visual impact on the surrounding countryside – see NPPF paragraphs 7, 17, 109, 110, 120, 124 and 125.
11. Building on the land would have a very harmful impact on the landscape – see NPPF paragraphs 113, 115, 156 and 170.
12. The adjacent land to the west is understood to be under-tunnelled – and thus severely unstable – see NPPF paragraphs 109, 120 and 121.
13. The most significant difficulty in providing access to and from the land for pedestrians, cyclists and motor vehicles.
14. The difficulty in providing public transport to and from the land – see NPPF paragraphs 17, 29, 35, 90 and 162.
15. The already almost unacceptable traffic congestion in the vicinity (the A367, the Park and Round roundabout, St Gregory’s College (recently expanded to incorporate a Sixth Form), Combe Hay Lane and Sulis Manor Road), particularly in the “travel to work and school period”.
16. The potential for the loss of the identity and the setting of Combe Hay, its Conservation Area and its many Listed Buildings.

**Change to the policy requested:**

These modifications assume that all other measures have been explored in order to remove (or most significantly reduce) the number of new homes required on the Land Adjoining Odd Down.

Such other measures should include:

- a. Increasing the density of new housing on “brownfield sites” in the District, especially in Bath.
- B. Striving harder to bring back into use the c. 500 empty properties in the District, especially those in Bath.
- C. Looking to identify offices in Bath, which might, with advantage, be converted into homes.
- D. Considering seriously the development (for housing) of Sulis Manor and its 3-plus hectares.

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E. Considering seriously the development (for housing) of the Odd Down Football Club’s large parcel of land.

F. Ensuring that “brownfield sites” in Bath are fully built-out first.

CSA 22 - Placemaking Principles – section 4 – Landscape Requirements – third bullet -

Add “Combe Hay Conservation Area and its setting”.

CSA 22 – Placemaking Principles – section 6 - Heritage Assets -

Add “Combe Hay Conservation Area, including its many Listed Buildings”.

Add “The A367 Turnpike Parish Boundary Markers”.

**Respondent Number:** 246    **Comment Number:** 12    **Respondent Name:**    **Respondent Organisation:** Combe Hay Parish Council

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

Please see Combe Hay Parish Council’s letter G3420, which is attached to the Comment Form Part 2 regarding CSA 22.

It is argued that the Bath and North East Somerset Core Strategy is NOT sound, in that it –

- a. Does not pursue the most appropriate strategy for determining the requirement for market and affordable housing.
- b. Is not consistent with National Policy, especially with regard to the Green Belt, the Cotswolds Area of Outstanding Natural Beauty, the protection of the Setting of the City of Bath World Heritage Site, the protection of a Scheduled Ancient Monument, the protection of biodiversity and the protection of other heritage assets.

**Change to the policy requested:**

Delete CSA 22 (Policy B3A) in its entirety.

If it is decided to continue with Policy B3A – see Combe Hay Parish Council’s letter G3420 for suggested modifications.

**Respondent Number:** 248    **Comment Number:** 1    **Respondent Name:**    **Respondent Organisation:** Crest Strategic Projects

**Agent ID:** 30    **Agent Name:** RPS Planning & Development

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

1) RPS has reviewed the evidence base associated with emerging policy B3A and considers it sufficient to enable a strategic allocation to be found sound at Odd Down. RPS would however query the extent of any viability work that has been undertaken that can justify unequivocally that 40% affordable housing can be achieved onsite. Clearly B&NES has a high affordable housing need and propensity to release as little land as possible to achieve the wider housing need objectives. There is little value in imposing unrealistically high affordable housing targets the sites it has identified if that leads to delays in site delivery. In turn that will have the undesirable consequences on the five year supply of land that B&NES is desperately seeking to avoid.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

2) RPS has reviewed the B&NES 'Transport Assessment' (October 2013) and broadly agree with the conclusions insofar as they relate to Odd Down. Evidently, the historic Sulis Manor is an important element of the heritage of the site and should be protected and integrated into the development sensitively. Nevertheless its retention will result in a degree of separation between the two parts of the allocation and the access strategy must therefore create suitable links to both. Access through the Sulis Manor housing estate to the north is the only reasonable and practicable means of serving the eastern part of the allocation. Access to South Stoke Lane would appear impractical from a heritage perspective and the resulting adverse impact on the Cross Keys junction. The cost of providing this link would increase overall costs of development significantly and would clearly compromise the ability to achieve the other aims of the policy, not least the 40% affordable housing figure. It would be helpful if this link were removed to aid clarity and demonstrate a clear delivery strategy.

**Change to the policy requested:**

Greater flexibility on the affordable housing provision is required.

Consider removal of 'potential' link to South Stoke Lane to aid clarity.

**Respondent Number:** 276 **Comment Number:** 3 **Respondent Name:** Mr Charles Hignett **Respondent Organisation:** Hignett Family Trust

**Agent ID:** 123 **Agent Name:** Savills (L&P)

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

See attached Report.

**Change to the policy requested:**

See Appendix 1 of attached Report

**Respondent Number:** 276 **Comment Number:** 1 **Respondent Name:** Mr Charles Hignett **Respondent Organisation:** Hignett Family Trust

**Agent ID:** 123 **Agent Name:** Savills (L&P)

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

Introduction

These Representations are submitted by Savills on behalf of the Hignett Family Trust to the Schedule of Core Strategy Amendments published in November 2013. The Hignett Family Trust owns land at Odd Down, Bath, part of which is allocated for development within the emerging Core Strategy.

The Hignett Family Trust has previously submitted representations to the emerging Core Strategy making the case for the allocation of a larger area of land for development than is current proposed in the Core Strategy. The position of the Trust has not changed since these representations were submitted. Indeed, it is maintained that residential development on the wider area of land (as outlined on the plan entitled "Alternative Option BT1" in Annex 3 of the Schedule of Core Strategy Amendments) is suitable, available and achievable. Based upon our assessed housing requirement for the Core Strategy we propose the expansion of the allocation to include this additional land in order to address, albeit in part, the additional land required.

Notwithstanding, we recognise the current uncertainty regarding the strategic housing requirement in the Core Strategy. Whilst it is our position that there should be an increase to the strategic housing requirement (and we have presented evidence to the Examination on this matter at the hearing sessions on 10-11 December 2013), these representations address the implications for the Core Strategy under two scenarios:

1. the strategic housing requirement remains as it currently stands in the Core Strategy; and,
2. the strategic housing requirement is increased and additional land is required to meet the need.

Under the first scenario, if the Inspector were to support the Core Strategy housing requirement, then through these representations we offer our conditional support for the proposed allocation in Policy B3A and the removal of land from the Green Belt (subject to specific changes to the Policy).

If the Inspector concludes that the evidence presented supports an increase to the strategic housing requirement then there will be a need to allocate further land through the Core Strategy to address the shortfall. It is the Trust's position that the most suitable and sustainable location to meet a proportion of this growth is on land to the east of the proposed allocation at Odd Down.

This approach is reflected in the structure of these representations. The first section addresses the principle of the proposed removal of land at Odd Down from the Green Belt. The conclusions in respect of the principle of development apply equally to both the current allocation and the wider allocation proposed by the Hignett Family Trust.

Following this, the second section includes our comments on the provisions of Policy B3A and in particular the Placemaking Principles. If the Inspector is minded to accept the strategic housing requirement currently proposed in the Core Strategy then it is these comments on the policy which are directly relevant.

The third section of these representations addresses the land to the east of the proposed allocation which is considered to be a suitable and sustainable extension to the allocation. This section of the representations is relevant should the Inspector conclude that additional or replacement land is required for housing.

We have separated the representations out in this manner to draw a clear distinction in our approach pending the preliminary conclusions from the Inspector on the objectively assessed housing need. If the Inspector supports the housing requirement in the Core Strategy as currently drafted then we advocate the changes to the Placemaking Principles of Policy B3A shown in Appendix 1. If however, the Inspector agrees with our conclusion that there should be an increase in the strategic housing requirement or that there is a need to increase the scale of land allocations for other reasons then we support not only the existing allocation but also the extension of this on land to the east.

In addition to the representations within this Statement, we deal with two other policy matters which have been amended through the Schedule of Changes to the Core Strategy through separate submissions. These relate to the 'disaggregated' approach to the calculation of the housing land supply position, and the proposed review mechanism.

One - Land at Odd Down, Bath  
Principle of Development

The allocation of the land at Odd Down first arose through the changes to the Core Strategy published for a consultation in March 2013. This document identified a broad area of search for an urban extension to the south of Bath which has subsequently been refined in order to define the proposed boundaries of the allocation. The Hignett Family Trust has liaised with the Council throughout this process and provided supporting evidence, which now forms part of the Core Documents Library for the Core Strategy Examination. This evidence is relevant to these Representations, however, rather than resupply the evidence, we will draw reference to the Core Documents Library where appropriate.

The evidence in the Core Documents Library pertinent to the land allocation at Odd Down which has been provided by the Hignett Family Trust comprises the following:

- Preliminary Capacity Assessment of Junctions by PFA (CD10/LD1a);
- Heritage Asset Assessment by CgMs (CD10/LD1b);
- Ecological Report by Kestrel (CD10/LD1c);
- Landscape Assessment and Strategy by Cooper partnership (CD10/LD1d).

The Hignett Family Trust very strongly support the principle of a strategic allocation on land at Odd Down and the removal of land from the Green Belt designation. The evidence base documents prepared by and on behalf of the Council outline the reasoning behind the allocation and its relative suitability and sustainability credentials. This is supported by the evidence prepared on behalf of the Hignett Family Trust. Combined these provide very clear evidence in support of the suitability and deliverability of the development.

There are however alternative professional judgements on certain detailed matters relating the physical extent and form of the development and the scale of the allocation. These judgements do not relate to the principle of development and can be determined through the pre-application part of the development management process.

It is this approach which sets the context for our comments on the Placemaking Principles in the subsequent section of these representations. Our proposed changes to these principles is intended to help facilitate the development management process and avoid pre-judging the outcome of the detailed assessments which are required to inform the design development process.

Notwithstanding our comments on the Placemaking Principles in the following section, we also have an alternative view to the Council on the extent of the Core Strategy allocation. This issue is addressed in the subsequent section of the representations.

#### Deliverability of the Allocation

In the preceding paragraphs we explained why we support the proposed allocation of the land at Odd Down. In this section we explain our reasons why we consider the allocation (both as proposed in the Core Strategy and the wider land allocation supported by the Hignett Family Trust) to be sound in the context of Paragraph 47 of the National Planning Policy Framework (NPPF). Paragraph 47 states: "To boost significantly the supply of housing, Local Planning Authorities should: .....identify and update annually a supply of specific deliverable sites...."

The footnote to Paragraph 47 expands upon the definition of "deliverable" in the context of Paragraph 47. This states: "To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable".

#### Available

The land within the ownership of the Hignett Family Trust is available for development to meet the growth needs of Bath. As outlined in the Introduction, there is a larger area of land within the ownership of the Trust which is available for development

For the avoidance of any doubt, the conclusion on the availability of the land relates to both the proposed allocation and the additional land to the east, up to the boundary of South Stoke Lane.

If the Council or Inspector determine that additional land is required to meet the housing requirement then this land would not only be suitable and achievable, but it would also be available for development.

#### Suitable

For the reasons provided in the Council and Hignett Family Trust evidence, it is considered beyond question that the land is suitable for development. The evidence produced addresses to an appropriate level of detail for the Core Strategy a number of technical considerations including highways, ecology and heritage etc. These matters have all therefore been considered prior to the allocation of the site.

We do not reiterate the evidence which has been produced through these Representations as this has all been put before the Examination. Suffice to say at this stage that there are no technical or environmental constraints which indicate that the land at Odd Down is unsuitable for development for any reason.

We note that the Council has published an update to the SHLAA (November 2013) alongside the Changes to the Core Strategy. The scale of development proposed in the updated SHLAA is not considered to be a justified or reasonable interpretation of the evidence. The key areas of disagreement are the extent of the set back area from the Wansdyke and

the delineation of the southern boundary of the site. These are two areas of disagreement over the impact of constraints; they do not impact upon the principle of development, only the physical extent of the allocation.

These matters can and will be addressed through the detailed design development process where a careful assessment can be made of the impact of development on all important considerations. As far as the Core Strategy is concerned, we are satisfied that the physical extent of the allocation is appropriate (for the scale of development proposed in the Plan) and consistent with the evidence.

#### Achievable

All of the land identified within the Policy B3A allocation, save for the Odd Down Football Club and the land within the curtilage of Sulis Manor, is within the ownership of the Hignett Family Trust. Importantly, the Trust also own the land immediately to the east, west and south of the allocation.

There are two potential options to achieve vehicular access into the site which involve land to the east and west of the proposed allocation. All of the land necessary to achieve these two options is owned by the Hignett Family Trust.

Furthermore, the ownership of the land to the south of the proposed allocation will enable the Trust to implement ecological mitigation on land within its control. The wider landownership of the Hignett Family Trust, beyond the extent of the proposed allocation is therefore an important consideration and one which ensures that the proposed development is entirely 'achievable'.

#### Two - Policy B3A Placemaking Principles

For the reasons set out above, we contend that the allocation of land at Odd Down is entirely consistent with the requirements of the NPPF and thus the principle of an allocation is sound.

We do nevertheless have a number of comments on the details of Policy B3A and in particular the 'Placemaking Principles'. These issues are addressed under the relevant sub-headings below.

#### Principle 1 – Scale of Development

The Council has proposed the removal of a specific area of land from the Green Belt and its allocation for around 300 dwellings during the plan period. Based upon the residential density of 35 – 40 dwellings per hectare specified in the policy, this scale of development is considered entirely achievable within the area of land proposed for allocation.

We recognise that at this stage of the planning process there are certain issues to be resolved with Council Officers and Statutory Consultees on matters which will determine the extent of the developable area. None of these issues impact upon the principle of development but they will influence its physical form and layout.

One example is the set back from, and response to, the Wansdyke Scheduled Ancient Monument. It is only through the detailed design development process that final agreement will be reached between the Hignett Family Trust, Council and English Heritage on the appropriate response to the Wansdyke SAM.

Based on a need to 300 dwellings, there are therefore very good reasons to remove the full extent of the proposed allocation from the Green Belt and, with the exception of the approach to the Manor Farm Buildings to the south (a matter that we will address later in these Representations), we agree with the Council's approach in determining the boundary for the allocation.

It is important to note that this conclusion is based on the current proposed scale of development. There will however be a need to identify additional land for development if one of the following applies:

- there is an increase in the strategic housing requirement;
- one or more Green Belt allocation(s) are not considered as suitable or sustainable locations for release and are therefore removed; and / or
- land within the flood zones fail the sequential approach and should not be assumed to contribute to the delivery of housing during the plan period.

These issues and constraints are addressed in representations to the Core Strategy submitted by the Hignett Family Trust.

The Land Allocation Report submitted by Savills on 30 October 2013 (CD10/LD1b) proposed the allocation of an area of land which reflects our understanding of the constraints. We recognise that our interpretation of the evidence varies from the Council and hence there is clear merit in the Core Strategy identifying the area of land proposed by the Council as this will provide both flexibility and certainty over delivery.

Based upon our interpretation of the constraints affecting the extent of the developable area, we considered the current proposed extent of the allocation has the potential to accommodate in the region of 600 dwellings<sup>1</sup>. Whilst we recognise the need for flexibility to take account of potential, and as yet unconfirmed constraints, we also recognise the need to make efficient and effective use of available land and to maximise the potential of land considered to be suitable for development. Indeed, this is particularly pertinent in an authority area such as B&NES where the availability of land on the edge of the principal City is constrained by both Green Belt and the AONB.

If the Hignett Family Trust's evidence and interpretation of the constraints is correct, there may, therefore, be an opportunity to increase the scale of the development within the boundary of the proposed allocation without any detrimental environmental impact.

The challenge is how best to address this through the emerging Core Strategy to ensure the plan is flexible, provides sufficient certainty over the deliverability of the required amount of housing, and will make the most effective use of suitable and sustainable allocations.

Our suggested response, which we endorse as a change to Policy B3A, is to allocate the land at Odd Down for a range of 300 - 600 dwellings. This would enable the Hignett Family Trust to bring forward proposals which, through the detailed design development process, respond to and address the important environmental considerations (such as heritage), whilst at the same time making the most efficient and effective use of land deemed appropriate for development.

This approach, would give the Council sufficient certainty that the land is capable of delivering at least 300 dwellings, but that it could make a more significant contribution towards meeting Bath's housing needs (within the boundary of the existing proposed allocation) if there were no technical or environmental constraints to achieving an increased scale of development. This is in our view the most pragmatic and appropriate response to the circumstances, and we strongly endorse this as a change to the first Placemaking Principle of Policy B3A.

Notwithstanding the above, we note that Odd Down Football Club is not currently located in the Green Belt. We do not object in principle to this land coming forward development, however, we do not consider that it should form part of the 300 dwelling allocation. This land could come forward independent of the allocation and should not therefore be treated as part of the 300 dwellings. As the Placemaking Principles suggest, it may be possible to relocate and improve the football club facilities on land alongside which could release a further 84 dwellings<sup>2</sup>.

#### Affordable Housing

At present, Policy B3A specifies an absolute requirement for 40% affordable housing on the allocation at Odd Down. We have two concerns relating to the policy approach to affordable housing specifically in relation to the Odd Down site.

First, the requirement for 40% affordable housing does not appear to correlate with either the viability evidence produced on behalf of the Council in support of the changes to the Core Strategy (B&NES Viability Update Study – December 2012) or the provisions of the Policy CP9 (Affordable Housing).

Map 3.1 of the December 2012 Study defines the viability 'sub markets' within the B&NES area. Whilst the resolution of the map makes it difficult to interpret precisely where the boundaries of each sub market lie, it would appear that the vast majority, if not all, of the allocation at Odd Down falls within the area defined as 'Bath South'. Based upon the viability characteristics of the Bath South sub market, the evidence recommends that the local planning authority should seek 30% affordable housing on new developments (based on a two-way split in paragraph 6.4 of the Viability Update Study). It is this approach which has been adopted in the Proposed Changes to the submitted Core Strategy (March 2013) where, in the changes to Policy CP9, a target of 30% affordable housing is sought in the 'Bath South' sub market.

The NPPF requires plan makers to pay careful attention to viability in formulating Local Plan policies. In so doing, local planning authorities are required to assess the likely cumulative impacts of proposed local standards and policies that support the development plan, alongside national requirements. There is no evidence produced by the Council which

supports the policy requirement for 40% affordable housing on the land at Odd Down and to propose this requirement without any evidence is inconsistent with the NPPF.

It is also important to note that the Viability Update Study calculates the achievable levels of affordable housing on the basis of Code Level 3 as the baseline build costs. Whilst it then tests the implications of Code Level 4, paragraph 4.13 of the Study confirms that “we have not considered it appropriate to test any additional impact of achieving higher Code Levels at this time”. Despite this, Placemaking Principle 11 in Policy B3A, requires new housing to achieve Code Level 5, or its successor, from 2014. To our knowledge, the Council has not therefore assessed the viability of achieving the levels of affordable housing proposed within the Policy either individually or cumulatively alongside the proposed sustainable construction requirements.

For the reasons set out in these representations, we object to the untested requirements of Placemaking Principle 11 (Sustainable Construction), though even at current build costs, the evidence supports the delivery of 30% affordable housing on the site at Odd Down and not 40% proposed in the Policy.

Second, the Odd Down site, like many others within the B&NES area is in a sensitive location. It will be extremely important for the development at Odd Down to deliver a high quality environment which responds to its location within the AONB and on the edge of the World Heritage Site. It is reasonable to assume that there are therefore likely to be higher than average build costs for residential development. With this in mind, it is in our view prudent to incorporate a degree of flexibility into the policy wording in relation to affordable housing to ensure that the additional costs of high quality design can be factored into the development appraisal and if necessary a balance struck between quality design and achievement of affordable housing.

For the reasons set out above, we advocate two changes to the Placemaking Principle relating to affordable housing.

#### Principle 2 – Masterplan

The area of land proposed for allocation is well related to the existing urban area and will facilitate a high quality development.

There are opportunities to integrate the proposed development well with the neighbouring areas using existing permissive paths and rights of way. These provide pedestrian access across the site to education facilities and the Sainsbury’s supermarket etc which are consequently only a short walk from the centre of the proposed development area.

Whilst detailed masterplanning of the site has not been undertaken at this stage, the HFT are very conscious of the need for high quality design and are committed to its delivery. The extent of the land allocated for development will enable a comprehensive design development process and the delivery of an attractive development which integrates well with the existing urban area.

#### Principle 3 – Green Infrastructure

The Hignett Family Trust are committed to the integration of appropriate Green Infrastructure within the land allocated for development and, where appropriate, on other land within the ownership of the Trust. Proposals for a multifunctional green space, SUDS and green linkages will be incorporated into the Masterplan proposals and will form a key component of the design concept.

The Trust’s commitment to Green Infrastructure is demonstrated by the extent of the existing planting which has taken place along the southern boundary of the proposed allocation. This planting will provide a visual barrier between the development and AONB to the south, ensuring the development will be contained within the visual limits of the city and not intrude into the open countryside.

#### Principle 4 – Public Rights of Way

Pedestrian connectivity with and integration into the existing urban form is essential to ensure that the development is a success and the sustainable links from the site are delivered. This Placemaking Principle is supported and will be addressed in detail through the design development process.

#### Principle 5 – Landscape and Ecological Mitigation Strategy and Management

With regards the landscape requirements, it is agreed that all existing trees and significant hedgerows should be retained

and protected where possible. We do not object to this broad Placemaking Principle, so long as it is recognised that there will need to be partial removal of hedgerows where this is necessary to achieve appropriate access and permeability within the site.

Regarding lighting, the light spill limit of 1 Lux is widely accepted as having no impact on horseshoe bats (it is equivalent to a bright moonlit night) but for clarity it would be useful to add “along bat flyways and foraging areas” to the end of this point.

With regards the Skylarks, it will not be possible to safeguard their existing habitat, however, this can be mitigated through the provision of suitable compensatory land within the ownership of the Hignett Family Trust. We suggest rewording this Placemaking Principle to indicate that the reference to ‘safeguarding’ can also include mitigating.

The final paragraph under ecological requirements includes reference to “compensation”. The term compensation has a strict meaning within the Habitats Directive and only comes into play if there is a significant impact on the SAC interests, in which case the proposal could only proceed under Regulation 61 of the Habitats and Species Regulations 2010 i.e. for Imperative Reasons of Over-riding Public Interest (IROPI). On the evidence of bat use at Odd Down there is no reason to suggest that the proposed allocation would have an adverse effect on the SAC so there will be no need for “compensatory measures”. Whilst we consider the likelihood of compensatory measures being required to be very low, we will discuss the wording of this element of the policy with the Council through the Statement of Common Ground.

In contrast to compensation we acknowledge the need for ecological mitigation. The proposals will include mitigation measures which will be taken into account and assessed in coming to a decision on the impacts associated with the proposed development.

The ecological consultant instructed by the Hignett Family Trust has also reviewed the HRA. We recognise that this is not part of the plan policy however we have three comments on the content for the Council.

- Under Part C Screening and assessment para 3, second sentence on page 5, the word “directed” should be changed to “located”.
- The reference to 0.1 Lux in paragraph 4 of the development requirements on page 27 appears to be an error. It is widely accepted limit of 1 Lux is appropriate, and the change proposed would tie in with the Placemaking Principles.

#### Principle 6 – Heritage Assets

We recognise the sensitivities of the site and the proximity to various designated and non- designated heritage assets. The impact on these assets has been assessed already to a certain extent through the work undertaken by CgMs (CD10/LD1b) on behalf of the Hignett Family Trust. We therefore recognise the importance of protecting these assets and their settings and will continue to engage heritage specialists throughout the design development process to work with the Council’s Conservation and Archaeology Officer and English Heritage.

As far as this Placemaking Principle is concerned, we agree that it is appropriate to highlight the key heritage assets and important considerations in their protection, however, the policy wording strays, in places, into an unnecessary level of detail. For example, under the reference to the World Heritage Site, the policy states that “the southern boundary of the site should remain undeveloped to limit the visibility of development in wider views”. Whilst there will inevitably be a discussion during the detailed design development process regarding the extent of the developable area within the context of a detailed understanding of the visibility of development, there is not, in our view, any need to make reference to an unspecified limit to the southern boundary through the Plan Policy.

The evidence produced by Cooper Partnership on behalf of the Hignett Family Trust specifically assesses the visual impact of development from the south. The cross-section through the site clearly illustrates the limitations on long-distance views and on the basis of the evidence available we do not therefore agree with the need for a significant set back.

Similarly, we recognise the need to protect the setting of the Wansdyke, however, the third bullet point under this subheading is somewhat unclear. The detailed response to the setting of the Wansdyke will be an important consideration during the design development process and can be dealt with appropriately at that stage.

Our proposed track changes to Policy B3A in Appendix 1 to these Representations identify the changes we consider appropriate to the policy wording to reflect this consideration. The changes do not seek to eliminate valid and

appropriate planning considerations. Instead they ensure consistency in the Placemaking Principles and allow the careful assessment of the key issues through the design development process.

#### Principle 7 – Transport

The Hignett Family Trust broadly support the majority of the criteria identified under the Transport Placemaking Principle within Policy B3A. There are only two points upon which we wish to comment.

First, the Placemaking Principle suggests that the development should interconnect with Sulis Meadows Estate and Sulis Manor, providing connections into existing roads. Our initial assessment of the highways network indicates that this is not required for highways purposes. We are aware that there is a great deal of local concern over the highways impacts within the Estate should the development link into the Sulis Meadow Estate. Whilst technically a link is achievable we do not propose that one is included as it is not necessary and its exclusion would respect the wishes of local residents adjacent to the site.

Second, the Policy as currently drafted in our view presents a slightly peculiar position in respect of the highways access arrangements. The first bullet point specifies that an access must be achieved from Combe Hay Lane. The fourth bullet point then acknowledges the potential vehicular access to the site from South Stoke Lane. In so doing it rightly acknowledges the importance to design any access from South Stoke Lane in a sensitive manner.

Until we have the benefit of (at least an initial output from) the Transport Assessment and the detailed design development process informed by a dialogue between the Trust, Council and English Heritage, it is too early to fix in policy whether access from Combe Hay Lane or South Stoke Lane is preferable and indeed if one would be sufficient or both are required. Our proposed change to the wording of the policy reflects this to enable sufficient flexibility to identify the most appropriate access through the design process and to incorporate this into the subsequent planning application.

In addition to the above comments on the Placemaking Principle, there is an opportunity through the development of the site and the introduction of a new access to close the existing access to the employment at Manor Farm Buildings. It is our understanding that this would have a positive impact on the local highway network and to that end we would advocate reference in the Placemaking Principles.

#### Principle 8 – Primary School

It is acknowledged that the development will increase pressure on primary school places in the vicinity of the site and a contribution towards the expansion of St Martin's Garden Primary School represents a logical solution to addressing this impact.

#### Principle 9 – Local Employment

We support the reference to local employment in this Placemaking Principle and the identification of the Manor Farm Buildings as the appropriate location. The only objection we have is to the exclusion of the Manor Farm Buildings from the change to the Green Belt boundary. There is no clear justification or planning rationale for specifying the location of the employment in the Policy and including it in the allocation, but then excluding it from the revisions to the Green Belt boundary.

In developing the detailed proposals for the land at Odd Down, it will be necessary to ensure that the development respects a number of important environmental and policy considerations. One such consideration is the impact that the development would have on the setting of the Green Belt. If the Manor Farm Buildings were excluded from the Green Belt boundary (as we propose), development proposals would nevertheless need to have due regard to the impact of the proposed development upon the setting of the neighbouring land within the Green Belt. The integrity of the wider Green Belt would not therefore be harmed if the land is excluded from the Green Belt.

Given this, we are not aware of any technical or policy reasons why the land should be allocated for development but retained within the restrictive policy designation of the Green Belt. On the contrary, to do so is we feel rather confusing for those reviewing the Plan, as to some observers it would inevitably be unclear why this element of the development is proposed in the Green Belt.

For the reasons set out above, we strongly advocate a change to the Green Belt boundary to exclude the Manor Farm Buildings and to align the change to the Green Belt boundary to be coterminous with the physical extent of the allocation.

In addition to the above concerns about the boundary, it would be helpful if greater clarity was provided in the Placemaking Principles about the form of the employment development proposed (e.g. maximum building heights etc). This is a matter which could be addressed through the Statement of Common Ground and, if appropriate, additional detailed provided in the Placemaking Principles.

#### Principle 10 – Odd Down Football Club

We have no objection to the proposed policy wording in relation to Odd Down Football Club.

#### Principle 11 – Sustainable Construction

Placemaking Principle 11 proposes that all new housing must meet Code for Sustainable Home Level 5 or its successor. No evidence is provided in support of the policy position nor is there any explanation why the Council deem it appropriate to deviate from the requirements of Core Strategy Policy CP2.

The Code for Sustainable Homes was developed between the development industry and Government to establish a timetable for enhanced sustainability in housing which could at that time be achieved without harming the delivery of housing. It has since been the subject of considerable debate and a Government consultation on changes to the future standards. Various cost studies and practical examples have demonstrated that the cost of achieving the higher Code Levels, particularly the step up to Code Levels 5 and 6, have a significant bearing upon build costs and consequently financial viability.

The actual impact on financial viability at the local level is however unknown as the evidence to test this has not been produced. In the absence of any evidence to demonstrate that the requirement for a higher sustainability standard on the land at Odd Down is either appropriate or viable, it cannot be sustained through the provisions of Policy B3A.

Indeed, to establish a policy requirement which exceeds the Government standards has the potential to put in jeopardy the delivery of residential development. It is for this reason that the NPPF guards against such an approach. Paragraph 95 states that:

“To support the move to a low carbon future, local planning authorities should:

... when setting any local requirement for a building’s sustainability, do so in a way consistent with the Government’s zero carbon buildings policy and adopt nationally described standards.” [our emphasis]

There is no justification nor indeed evidence to support an alternative local standards on specific allocation sites within the emerging Core Strategy. Indeed, to do so is inconsistent with the requirements of the NPPF. We therefore recommend that this Placemaking Principle is amended to make reference to the latest national standard.

#### Principle 12 – Land Instability

Technical Studies undertaken to date indicate that there are no significant constraints in relation to land stability within the extent of the proposed allocation. Nevertheless, we do not object to the proposed policy wording in this regard as it is indeed an important consideration which would need to be addressed should any concerns arise in the future.

#### Conclusion

Overall we strongly support the principle of development on land at Odd Down and agree with the Council that this represents a highly suitable and sustainable location for development. We do nevertheless propose some changes to the policy which we believe will improve the Plan and establish a robust yet flexible framework for the determination of a future planning application. These changes are shown on the tracked changed version of the Policy attached at Appendix 1.

In addition to the text changes to the Policy, we also proposed the redefinition of the Green Belt boundary to exclude the Manor Farm Buildings. The Manor Farm Buildings are named in the policy wording and the physical extent of the proposed allocation, and it is entirely logical in our view to revise the Green Belt boundary to also exclude this part of the allocation.

#### Three - Land to the East of the Odd Down Allocation

For the reasons set out in the preceding section of these representations we support the allocation of land for

development at Odd Down, albeit with certain changes to the detailed wording of Policy B3A. These changes are based upon the implicit assumption that the strategic housing requirement in the Core Strategy remains at 12,960 and that the Inspector supports the other allocations in the authority area.

Notwithstanding the comments and proposed changes in the previous two sections, we strongly support the allocation of a wider area of land at Odd Down<sup>3</sup>. It is our view that, for the reasons discussed at the Examination hearing on 10-11 December 2013, the housing requirement should be increased to a minimum of 14,292 dwellings. In order to address the increased requirement in the most sustainable manner we advocate the easterly extension of the Odd Down allocation and the drawing of the boundary along South Stoke Lane.

The additional land extends to approximately 25 acres and is capable of accommodating in the order of 150 dwellings<sup>4</sup>. For the reasons given in section one of these representations, this land is entirely suitable for development, available immediately and achievable. Its allocation would therefore be both appropriate and consistent with the provisions of the NPPF.

The reason that the allocation currently excludes this land is explained in the Report by Land Use Consulting on behalf of the Council (CD9/LV/1). This concludes that there is a high risk of a negative impact on the World Heritage Site and, in respect of the northern field, the setting of the Wansdyke. Whilst we acknowledge the importance of these considerations and do not dispute their relevance in determining the scale and extent of development in this part of the site, we do not agree with the magnitude of the response.

Evidence produced by CgMs on behalf of the Hignett Family Trust (CD10/LD1b) examines the importance of this land on the setting of the World Heritage Site. The CgMs Report addressed this matter in paragraphs 2.1.14 – 2.1.15, which state:

2.1.14 In terms of the eastern half of the Site within the plateau (fields East 1, 2, 3 and 4), any development that does not break the skyline viewed from within the hollow of the City will have no harm on the WHS. There is the opportunity to enhance the 'treed' nature of this skyline, when experienced from within the City's hollow, by suitable planting in an area which is currently sparse in this regard. This would also have the effect of softening the elements of 'hard', ungreen skyline caused by the late twentieth and early twentieth-first-century development abutting the northern edge of the City's hollow. Such planting would, however, need to be set at an appropriate distance from the Wansdyke scheduled monument to avoid harm to this heritage asset through the planting of trees and their subsequent root growth (addressed further below).

2.1.15 Views limited to the north-east corner of the Site from the Midford Road in front of the listed Cross Keys public house, would be likely to break the impression of the green-tinged, 'treed' edge to the lip of the City's hollow. Development would, therefore, need to be set back up to 35 m from the corner of the Site, be of low elevation (no greater than two storeys) and be suitably screened with appropriate tree planting.

In addition to this the Report by the Cooper Partnership on behalf of the Hignett Family Trust assesses the landscape impact from these two fields. Paragraphs 5.7 - 5.8 of the 'Land at Odd Down: Landscape Assessment and Strategy' (CD10/LD1d) states:

5.7 The third area of the Council's concern is that of Field East 2, which is defined as having high negative significance due to the views from the Cross Keys public house. While views exist from the public house, they are limited in extent and significance. A well designed open space could provide a sense of openness to this area, as well as a suitable entrance to new housing.

5.8 The Council is rightly concerned about the setting of Wansdyke. Site inspection shows that the recently approved Crest development has been pulled back from the edge of this designated asset, and it is considered appropriate for a similar set back along Fields East 1 and East 3. However, the new development should provide an active face to the monument and the dyke properly protected. There will be some loss of openness, but the existing view to the south is only short distance, because of the enclosure afforded by the woodland along the scarp. Further information is provided in the heritage report.

Based upon the advice of these specialists there is no reason to preclude development in its entirety from the land to the east of the proposed allocation provided the Masterplan carefully responds to these considerations. Whilst part of this

area is sensitive and the impacts will need to be carefully addressed through the design development process, they do not preclude development of the entire area in principle. Taking into account these constraints, the additional land is likely to be capable of accommodating approximately 150 dwellings.

The SA/SEA Addendum (November 2013) provides an analysis of the development of individual parcels of land against 20 sustainability objectives. There are minor variations in the assessment of different parcels under some of the objectives, however, there is very little difference in the overall conclusions. Whilst we do not necessarily agree with each of the assessments in the SA/SEA Addendum, we do not intend to tackle the assessment of individual sites against the identified objectives. These assessments are inevitably based on individual interpretations of the impacts of development and it is possible therefore to come to an alternative interpretation.

The key point so far as these representations is concerned is that there are no major differences in the impact of any of the development parcels. There is not one parcel of land which stands out as scoring better or worse in sustainability terms than the average for the site as a whole.

Whilst the SA/SEA Addendum does therefore provide a helpful analysis of the sustainability merits of the different parcels of land within the site, it does not score the additional land to the east of the allocation significantly better or worse than the land within the allocation. There is therefore no reason to draw a distinction in terms of sustainability between the allocated land and the unallocated land to the east.

#### Safeguarded Land

Should the Inspector support the strategic housing requirement in the Core Strategy it is nevertheless important to consider changes to the Green Belt boundary which will endure beyond the plan period.

If such circumstances were to arise, an alternative to the allocation of the land would be its designation as 'safeguarded land'. The identification of 'safeguarded land' is supported in paragraph 85 of the NPPF. We consider that it is necessary to identify 'safeguarded land' on the edge of Bath to provide for the long term development needs of the City beyond the current plan period.

The land to the east of the existing allocation would represent an ideal candidate for 'safeguarded land' should it not be required for development during the current plan period. Indeed, the land is well related to the built up area and would provide a logical additional phase to the development at Odd Down. For the reasons outlined above this land is considered suitable, available and achievable and could therefore be brought forward to deliver housing as and when required.

#### **Change to the policy requested:**

Land is removed from the Green Belt as shown on the Key Diagram and Policies Map and allocated for residential development and associated infrastructure during the Plan period.

The requirements that need to be met to enable development are set out in the Placemaking Principles, Core Policies and indicated on the Concept Diagram. The Placemaking Principles, being site specific, take priority over the Core Policies.

#### Placemaking Principles:

1 Residential led mixed use development (to include 430% affordable housing, unless it is agreed with the Council that the viability of development indicates a lower percentage is appropriate) of around 300 – 600 dwellings, in the plan period. The site should be developed at an average density of 35-40dph.

2 Preparation of a comprehensive Masterplan, through public consultation, reflecting best practice as embodied in 'By Design' (or successor guidance), ensuring that it is well integrated with neighbouring areas.

3 Provision of Green Infrastructure including multifunctional green space (formal, natural and allotments); well integrated Sustainable Urban Drainage Systems and habitat, pedestrian and cycle connectivity within the site and to the surrounding area.

4 Include new Public Rights of Way and provide enhanced public access within the site and connecting well to the surrounding area.

5 A Landscape and Ecological Mitigation Strategy and Management Plan is required, as part of the Masterplan, to ensure satisfactory mitigation and protection to include:

#### Ecological Requirements

- Protection of dark skies to the south and east of the location including zones of no artificial light adjacent to the protected tree belt and other ecological features retained or created within the site and in adjacent grazing lands. Light spill should be limited to no more than 1 Lux (equivalent to a moonlit night) along bat flyways and foraging areas.
- Retention and cultivation of planting features and off-site habitat including the retention of hedgerows and tree belts, as indicated on the Concept Diagram.
- Safeguard skylark interest, through adequate mitigation or off-site compensation.
- New woodland planting along the southern boundary of the plateau, particularly to the east of Sulis Manor (i) within the site and (ii) off-site within the plateau in order to strengthen bat foraging and flight links with Horsecombe Vale.
- A recreational strategy to minimise harm to adjacent grazing regimes and habitats Particular attention is to be given to ensure satisfactory compensation, mitigation and protection of European protected bat species and their habitat, and the protection of

#### Priority Species.

#### Landscape Requirements

- Retention and protection of existing trees and significant hedgerows as far as practicable within the Masterplan by, for example, inclusion within public open space and enhance hedgerows by provision of additional planting
- Protect the tree belt on the southern edge of the site and enhance with additional planting to ensure visual screening of the site from views to the south
- Avoid or minimise detrimental impacts on (and provide enhancements to important landscape features and significant views):
  - the Cotswolds AONB
  - South Stoke Conservation area and its setting
  - The character of the Cam Brook valley and Sulis Manor Plateau
  - The character of South Stoke and Combe Hay Lanes
  - Midford Road and the Cross Keys junction including maintaining open rural views over the plateau
  - The Wansdyke Scheduled Ancient Monument
  - Medium and long distance views such as Upper Twinhoe and Baggridge Hill

6 Development causing substantial harm to designated heritage assets, or non- designated heritage assets of demonstrably equivalent significance, and/or their settings should be avoided. In addition, all opportunities should be taken to avoid or minimise other harm. As part of the Masterplan, the following should be addressed:

#### World Heritage Site

- Careful consideration should be given to the Southern boundary of the site should remain undeveloped to limit the visibility of development in wider views. An acceptable southerly extent of development and appropriate building heights will need to be established as part of the Masterplan.
- The Easterly extent of development and appropriate Eastern boundary treatment should be established as part of the Masterplan.
- Control light pollution to protect the visual screening of the site from views to the south.

#### Wansdyke Scheduled Ancient Monument

- Avoid built development in areas that would cause substantial harm to the Wansdyke. An acceptable northerly extent of development and development heights will need to be established as part of the Masterplan. To mitigate impacts tree planting should be retained as indicated on the Concept Diagram.
- A Management Plan setting out a strategy for the long-term and effective management of the monument including detailed measures for its positive enhancement will be developed in consultation with English Heritage and form part of any development proposals. This should include a recreational and movement solution which serves the new community and minimises harm to the Scheduled Ancient Monument.
- Limit development height and density in more prominent areas, such as higher ground and development edges, in order to avoid the development breaking the skyline in views from the Wansdyke.
- Limit lighting column heights to that of the development to minimise vertical features within the view from the Wansdyke.

#### South Stoke Conservation Area

- Limit the height and/or density of development closest to South Stoke Conservation Area to avoid and minimise harm to its setting.

#### Sulis Manor

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• Incorporate Sulis Manor and garden into development sensitively, retaining the framework of trees, and considering the conversion/retention of the Manor House and/or a low density development

7 In relation to transport, the following apply:

• Provide vehicular access, and junction enhancement, to facilitate access to the site from Combe Hay Lane and / or South Stoke Lane. Access from South Stoke Lane would necessitate upgrading the Cross Keys junction. Any access road from South Stoke Lane would need to be sensitively designed to enable the maintenance of an open down landscape in views from Cross Keys and Midford Road.

• In assessing the access arrangements for the site, consideration should be given to the potential for the closure of the existing access to the Manor Farm Buildings, provided a suitable alternative can be incorporated into the development proposals.

• Interconnect with Sulis Meadows Estate and Sulis Manor, connecting existing roads into the new development. This should include pedestrian and cycle links.

• Links to the National Cycle Route 24 and Two Tunnels should be facilitated.

• There is a potential vehicle access to the site from which would necessitate upgrading the Cross Keys junction. Any access road from South Stoke Lane would need to be sensitively designed to enable the maintenance of an open down landscape in views from Cross Keys and Midford Road.

• Provide a sensitively designed and improved pedestrian/cycle link, following the desire line to Cranmore Place/Frome Road to allow access to Threeways School and the Supermarket.

• Provide a safe and attractive pedestrian/cycle link to the Odd Down Park and Ride from the site.

• Ensure sufficient car parking in the vicinity of St Gregory's School to meet the school's needs

8 Contributions will be required to facilitate the expansion of St Martin's Garden Primary School.

9 The provision of additional local employment will be supported at Manor Farm Buildings, through conversion and redevelopment.

10 Retain and/or enhance the Odd Down Football Club (Football Pitches, Clubhouse and changing facilities, play area, local market and car park) either:

(i) in its current location; or

(ii) by re-providing the Football Club with an equivalent facility within the area

11 Sustainable Construction will be required to achieve the most up to date sustainability standards., with all new housing meeting Code for Sustainable Homes Level 5, or its successor, from 2014. The solar energy potential of sites should be facilitated by design and orientation. Development will be expected to provide sufficient renewable energy generation to reduce carbon dioxide emissions from expected energy use in the buildings by at least 20%. Third party delivery options will be expected to have been considered and in exceptional circumstances Allowable Solutions may be utilised.

12 Localised areas of land instability must be either avoided or addressed with appropriate remediation.

**Respondent Number:** 278 **Comment Number:** 1 **Respondent Name:**

**Respondent Organisation:** Cotswold Conservation Board

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

1. Paragraph 14 of the National Planning Policy Framework (NPPF) includes: "For plan-making this means that:

• local planning authorities should positively seek opportunities to meet the development needs of their area;

• Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as whole; or specific policies in this Framework indicate development should be

restricted.<sup>9</sup>

Footnote 9 states:

“9 For example, those policies relating to ... an Area of Outstanding Natural Beauty...”

2. NPPF paragraph 47 includes:

“47. To boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as Section 87, Countryside and Rights of Way Act 2000. “far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;”

3. NPPF paragraph 115 states:

“115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.”

4. NPPF paragraph 116 states:

116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which that could be moderated.

5. Thus NPPF paragraphs 115 and 116 make clear that development within an Area of Outstanding Natural Beauty may be restricted, and that “exceptional circumstances” need to be demonstrated if planning permission is to be granted for major development in these areas. It is clear therefore that where policies within the NPPF restrict development, then the “full, objectively assessed needs for market and affordable housing in the housing market area,” may not be able to be met.

6. Since the sites under consideration in the proposed Core Strategy amendments are “strategic allocations”, they clearly represent “major development” in relation to paragraph 116 and must comply with the policy set out in that paragraph.

7. This was also confirmed by the Inspector examining the Wealden District Core Strategy, Michael Moore BA (Hons) MRTPI CMILT MCIHT, when, in his proposed modifications dated 5th March 2012, he deleted the only housing allocation within the High Weald AONB for around 160 dwellings for the following reason:

“26. PPS7 indicates that the conservation of the natural beauty of the landscape and countryside should be given great weight in planning policies for AONBs.

Major developments should not take place in these designated areas except in exceptional circumstances and should be subject to the most rigorous examination. They should be demonstrated to be in the public interest. The Council considers that in PPS7 terms the SDA would constitute a minor development. However, AONBs are areas of countryside and attractive landscape. In this context, a residential development of the scale proposed, considered by the Council to be a strategic provision, must be regarded as major. While the criteria for consideration of major development in para 22 of PPS7 are expressed in terms of applying to planning applications they must logically also relate to proposals in plans.”

[Board’s italics]

18. We see that the criteria set out in paragraph 22 of the former PPS 7 are essentially repeated in paragraph 116 of the NPPF. One of the criteria to be assessed is “the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way”.

19. This issue was addressed by the Inspector reporting to the Secretary of State for his decision on the Highfield Farm,

Tetbury appeal (APP/F1610/A/11/2165778):

Conclusions in respect of paragraph 116 of the Framework

14.69 ... But importantly, in terms of the harm that would be caused to the AONB, I have not been provided with any evidence to suggest that there is anything other than very limited scope indeed to provide housing within the District on sites that are not part of the AONB. [Boards italics]

The Secretary of State concurred with the Inspector:

The cost of, and scope for, developing elsewhere.

20. The Secretary of State agrees that it is preferable for development to be accommodated on previously-developed land (IR14.51); but there is no evidence to indicate that the remaining shortfall could be addressed solely through the use of previously developed sites. He notes that the Inspector found no evidence of anything other than very limited scope to provide housing on sites outside the AONB (IR14.52). Although preliminary work on the Core Strategy Second Issues and Options Paper identifies a potential strategic site at Cirencester, outside the AONB (IR8.33), he attributes limited weight to this due to the early stage of plan preparation.

20. We conclude that the Secretary of State considers that there should be consideration of the scope for developing sites within the District but outside the AONB before releasing major development sites inside. We note that the BANES

SHLAA (November 2013) indicates that there is considerable scope for development within the District but outside the AONB. Examples are as follows:

Land in the Green Belt to the SE of Bristol

Paragraph 2.53 of the SHLAA summary considers a site at Hicks Gate. It states:

“The potential of the area (within BANES) is at least from 650 and rises to 1200 if a greater level of environmental impact and Green Belt intrusion is accepted. It is the impact on the Green Belt and the separation of Bristol, Keynsham and Bath that is the key issue here. This is perhaps the most sensitive area of Green Belt in BANES. The impact on the highways network is also of concern with traffic already backing up along the A4 through Brislington.”

Paragraph 2.54 of the SHLAA summary considers a site at Whitchurch. It states:

“The report (Development Concept Options Report) concludes that if all the area is available for development then 3000 dwellings could be forthcoming. If the majority of Horseworld is removed from the equation then the capacity of the area is unlikely to exceed 2000. Significantly less than this is currently deliverable in the absence of major highway improvements. Barton Willmore suggest a first phase of 600 could come forward without such improvements.

21. The Board therefore suggests that even the minimum potential development at these two sites would provide an additional 1250 dwellings, comfortably exceeding the numbers proposed to be provided from the AONB sites at Weston and Odd Down to meet the suggested shortfall in housing numbers for the Council area as a whole.

23. With respect to the description in the SHLAA of the importance of the Green Belt at Hicks Gate, the Board would suggest that the landscape of the Green Belt at Odd Down and Weston is considerably more sensitive, being designated as part of an AONB and forming part of the setting of a World Heritage Site: as stated in NPPF paragraph 115, AONBs have the highest status with respect to protection in relation to landscape and scenic beauty.

24. However, the Board regards the availability and merits of land to the south-east of Bristol as informative rather than decisive. It would remind the Council that, whether or not there is land elsewhere which can be identified for development,

§116 of the National Planning Policy Framework still requires a presumption against development in an AONB unless exceptional circumstances can be demonstrated. There may well be cases where (§5 above) as a result of policies within the NPPF restricting development, the “full, objectively assessed needs for market and affordable housing in the housing market area” cannot be met.

Conclusion

25. The Board objects to the Core Strategy amendments relating to the allocation of land at Weston (CSA25, 26, 27 and 28) and Odd Down (CSA22, 23 and 24) on the grounds that they do not show the “exceptional circumstances” which Paragraph 116 of the National Planning Policy Framework requires to be demonstrated for the allocation of these sites for

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

major development in the Cotswolds AONB .

**Change to the policy requested:**

Deletion of allocation.

**Respondent Number:** 279 **Comment Number:** 2 **Respondent Name:** Rohan Torkildsen

**Respondent Organisation:** English Heritage

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

Change ref: CSA22 Strategic Allocation Odd Down Placemaking Principles

In the proposed amendments to the Core Strategy there are a series of Placemaking Principles. Reference is made to a requirement that no development causes “substantial harm” to heritage assets. Unfortunately this fails to recognise policy in the NPPF (paragraph 132-134) which emphasises that “great weight should be given to the assets conservation . The more important the asset, the greater the weight should be.”

It should be noted that scheduled monuments are of the “highest significance” and “any harm should require clear and convincing justification.”

At present it appears that the Placemaking Principles will not afford great weight to the conservation of the Wansdyke, merely protection from substantial harm.

Also the Plan fails to provide “clear and convincing justification” or explain the “public benefits” \* that would derive from less than substantial harm to the significance of the Wansdyke.

Change ref: CSA22 Strategic Allocation Odd Down Placemaking Principles

In the proposed amendments to the Core Strategy there are a series of Placemaking Principles. Reference is made to a requirement that no development causes “substantial harm” to heritage assets. Unfortunately this fails to recognise policy in the NPPF (paragraph 132-134) which emphasises that “great weight should be given to the assets conservation . The more important the asset, the greater the weight should be.

"It should be noted that scheduled monuments are of the “highest significance” and “any harm should require clear and convincing justification".At present it appears that the Placemaking Principles will not afford great weight to the conservation of the Wansdyke, merely protection from substantial harm.

Also the Plan fails to provide “clear and convincing justification” or explain the “public benefits” \* that would derive from less than substantial harm to the significance of the Wansdyke.

**Change to the policy requested:**

To accord with the principles and policies of the NPPF you should address the above omissions, and also revise the Placemaking Principle no. 6 to read:

- First sentence - "The significance of heritage assets affected will be conserved. As part of the masterplan the following should be addressed:..."
- Fourth bullet Point - Wansdyke Scheduled Ancient Monument

Avoid built development in areas that would cause substantial harm fail to conserve the significance of the Wansdyke. An acceptable ...”

\*It should be noted that as the Wansdyke is on the national Heritage at Risk Register the Placemaking Principle requiring a conservation management plan to be prepared and funded by the development may be considered a public benefit.

If the above can be clarified, addressed and the Placemaking Principles modified English Heritage would not challenge the

soundness of the Plan with regard to this allocation.

**Respondent Number:** 281    **Comment Number:** 1    **Respondent Name:** Amanda Grundy    **Respondent Organisation:** Natural England  
**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**

Support:

Thank you for your consultation on the above dated 08 November 2013 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Legal compliance and soundness

Natural England is satisfied that the concerns we raised regarding potential landscape and ecological impacts of development at Odd Down and Weston Slopes have been adequately addressed in the revised Core Strategy. In so far as it relates to those areas upon which Natural England is qualified to comment, we consider the revised Core Strategy to be generally legally compliant, sound and in conformity with the National Planning Policy Framework (NPPF).

Previous concerns

In our response to the Proposed Changes to the Bath and North East Somerset Submitted Core Strategy – Part 1 of the Local Plan, dated 8th May 2013, we raised concerns regarding potential effects of the proposed development on the edge of Bath on the special qualities of the Cotswolds Area of Outstanding Natural Beauty (AONB) and on the Bath & Bradford on Avon Bat Special Area of Conservation (SAC).

The Council has since commissioned a number of further studies and undertaken a detailed and evidence based assessment of the land adjoining Odd Down and at Weston, including with respect to the AONB and the Bat SAC. The assessments identified a range of site specific constraints and have helped to determine the developable area and the requirements from new development in these locations.

Policy B3A Land adjoining Odd down, Bath Strategic Site Allocation and Policy B3B Land adjoining Weston, Strategic Site allocation set out the place-making principles and detailed development requirements, which include the preparation of a comprehensive masterplan and a Landscape and Ecological Mitigation Strategy and Management Plan. The site allocation policies are further supported by concept diagrams.

Cotswold AONB

The assessment of the landscape impacts of development at Odd Down and Weston followed up to date guidance produced by the Landscape Institute and provided a field by field assessment of the broad search areas. The assessment of the landscape and visual impact of development on the Cotswold AONB included consideration of the AONB “Special Qualities of Significance” as identified in the AONB Management Plan 2013-2018. Special qualities identified for these areas comprised ‘escarpment views, tranquillity and accessible landscape for quiet recreation’.

The detailed landscape assessment findings and conclusions appear reasonable and to have informed the revised allocation boundaries and shaped the site allocation policies and should help to significantly moderate the potential impacts on the AONB, as far as is reasonably possible given the land in question lies within the AONB.

Based on an understanding that the need for development on the edge of Bath has been identified by the Council and alternatives investigated via the Sustainability Appraisal process, Natural England is satisfied that development at Odd Down and Weston, if undertaken in accordance with the revised Plan, would not undermine the designation purposes of

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the AONB. The masterplan process, as identified in the evidence findings, will be fundamental to ensuring harm can be reduced as much as possible by incorporating appropriate mitigation measures into the design and layout of development.

Bath & Bradford on Avon Bat SAC

Natural England welcomes the further bat surveys and detailed analysis of these that have been undertaken by the Council's ecologist and consultant bat expert. We are satisfied that the detailed policy requirements set out in Policy B3A and Policy B3B have been underpinned by sound evidence and should help to ensure development at Odd Down and Weston Slopes does not result in an adverse impact on the integrity of the European Site.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Amanda Grundy on 0300 060 1454. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

**Change to the policy requested:**

**Respondent Number:** 281 **Comment Number:** 2 **Respondent Name:** Amanda Grundy

**Respondent Organisation:** Natural England

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**

**Support:**

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Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Legal compliance and soundness

Natural England is satisfied that the concerns we raised regarding potential landscape and ecological impacts of development at Odd Down and Weston Slopes have been adequately addressed in the revised Core Strategy.

In so far as it relates to those areas upon which Natural England is qualified to comment, we consider the revised Core Strategy to be generally legally compliant, sound and in conformity with the National Planning Policy Framework (NPPF).

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In our response to the Proposed Changes to the Bath and North East Somerset Submitted Core Strategy – Part 1 of the Local Plan, dated 8th May 2013, we raised concerns regarding potential effects of the proposed development on the edge of Bath on the special qualities of the Cotswolds Area of Outstanding Natural Beauty (AONB) and on the Bath & Bradford on Avon Bat Special Area of Conservation (SAC).

The Council has since commissioned a number of further studies and undertaken a detailed and evidence based assessment of the land adjoining Odd Down and at Weston, including with respect to the AONB and the Bat SAC. The assessments identified a range of site specific constraints and have helped to determine the developable area and the requirements from new development in these locations.

Policy B3A Land adjoining Odd down, Bath Strategic Site Allocation and Policy B3B Land adjoining Weston, Strategic Site allocation set out the place-making principles and detailed development requirements, which include the preparation of a comprehensive masterplan and a Landscape and Ecological Mitigation Strategy and Management Plan. The site allocation

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policies are further supported by concept diagrams.

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The assessment of the landscape impacts of development at Odd Down and Weston followed up to date guidance produced by the Landscape Institute and provided a field by field assessment of the broad search areas. The assessment of the landscape and visual impact of development on the Cotswold AONB included consideration of the AONB “Special Qualities of Significance” as identified in the AONB Management Plan 2013-2018. Special qualities identified for these areas comprised ‘escarpment views, tranquillity and accessible landscape for quiet recreation’.

The detailed landscape assessment findings and conclusions appear reasonable and to have informed the revised allocation boundaries and shaped the site allocation policies and should help to significantly moderate the potential impacts on the AONB, as far as is reasonably possible given the land in question lies within the AONB.

Based on an understanding that the need for development on the edge of Bath has been identified by the Council and alternatives investigated via the Sustainability Appraisal process, Natural England is satisfied that development at Odd Down and Weston, if undertaken in accordance with the revised Plan, would not undermine the designation purposes of the AONB. The masterplan process, as identified in the evidence findings, will be fundamental to ensuring harm can be reduced as much as possible by incorporating appropriate mitigation measures into the design and layout of development.

#### Bath & Bradford on Avon Bat SAC

Natural England welcomes the further bat surveys and detailed analysis of these that have been undertaken by the Council’s ecologist and consultant bat expert. We are satisfied that the detailed policy requirements set out in Policy B3A and Policy B3B have been underpinned by sound evidence and should help to ensure development at Odd Down and Weston Slopes does not result in an adverse impact on the integrity of the European Site.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Amanda Grundy on 0300 060 1454. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

**Change to the policy requested:**

**Respondent Number:** 837    **Comment Number:** 9    **Respondent Name:** David Redgewell    **Respondent Organisation:** South West Transport Network Railfuture

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

KM1 remove the green belt allocation.

We would like to see this housing site allocated to deal with the need for meeting the housing waiting list in Bath and Keynsham for affordable and rented housing. With use of the A4 corridor / rail corridor stations in Keynsham and Saltford, new bus services, plus new services X39, 338, 339 A4 around the new housing estate with bus link to Bristol and Bath and extra industry estate / business units around Broadmead. This is very, very suitable location with the NP framework supporting housing land allocation.

**Change to the policy requested:**

More housing is required on sustainable transport corridor with the Odd Down Park & Ride. Site. The reason to provide affordable housing to meet the 4000 – 5000 homes required in the district with good public transport links to Bath Spa railway station, bus station, city centre and Oldfield Park station.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

**Respondent Number:** 837    **Comment Number:** 13    **Respondent Name:** David Redgewell    **Respondent Organisation:** South West Transport Network Railfuture

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

We believe with good quality urban design and place making Odd Down could take more housing to meet the 4000 – 5000 required units within waiting list for BANES.

**Change to the policy requested:**

The site is close to the Bath transport package, Network of Showcase bus routes and main Park & Ride site., which could be developed on Fullers Earth Works. The Showcase 178, 179 184 and 173 bus routes operate this corridor.

**Respondent Number:** 939    **Comment Number:** 1    **Respondent Name:** Trevor Osborne

**Respondent Organisation:** The Trevor Osborne Property Group Ltd

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Comment on new sites

**Comment made on the Proposed Change:**

**Support:**

B&NES' assessment of both housing needs and available sites to accommodate growth are unsound leading to the suggested number of houses to be provided on green field sites. Identified MOD sites can accommodate greater density and other potential sites have not been considered. By way of example, the development of Green Park House with student housing will release circa 100 homes for family occupation. The housing numbers have been increased beyond the total required because the Council's affordable housing policy requires a level of affordable housing which will not satisfy need. Instead, the Council should consider other locations for affordable housing or adjust the proportion of affordable homes in any development for which consent is sought. No account has been taken of the homes now to be created from change of use following the relaxation of permitted development. As confirmed by the Secretary of State, policies to protect the Green Belt and Areas of Outstanding Natural Beauty must not be sacrificed especially on the basis of the dubious assumptions upon which the Core Strategy is based.

**Change to the policy requested:**

Abandonment of the proposal to release land in the Green Belt and identified as an Area of Outstanding Natural Beauty, the justification for which is that Government Policy is to protect the Green Belt and, in any event, the Council's research on the availability of sites for housing is inadequate. The forecast in household growth is not accepted and the means by which data is collected is unconvincing. The capacity of Brown Field sites and the Council's release of land in its ownership has the potential to build both architectural and economically viable projects within the City making the City extensions which are proposed inappropriate and unnecessary. The Green Belt to the south of the City must not be lost as a result of poorly researched evidence and inevitably wrong advice being offered to Council Members and now the Inspector.

**Respondent Number:** 939    **Comment Number:** 2    **Respondent Name:** Trevor Osborne

**Respondent Organisation:** The Trevor Osborne Property Group Ltd

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA22 Land adjoining Odd Down**Location:** Comment on new sites**Comment made on the Proposed Change:**Support: 

I wish to make it clear in these final days that I am opposed to the prospect of housing on the South Stoke Plateau.

Bath is a very special city with UNESCO World Heritage Site status.

It is surrounded by Green Belt and, in addition, the South Stoke Plateau is in the Cotswold Area of Outstanding Natural Beauty.

The Wansdyke ancient scheduled monument has appropriate protection and the Greater Horseshoe Bats, Skylarks and other wildlife are abundant on the Plateau.

For this land to be used for a town extension would be unforgivable. It is contrary to all the statements made by the Secretary of State. It is contrary to the protected status of the land by the abovementioned designations and, in any event, is unjustified by any rational explanation or justification of the housing need.

The Core Strategy housing numbers are a flawed estimate. They are excessive, have been manipulated to an increased level to produce sufficient affordable housing in compliance with the Council's proportionate policy of affordable to private sale provision. In addition, the Council have failed to recognise the potential for further housing on more acceptable sites, particularly those which are Brown Field and within the City.

The Council's own land holding will accommodate many more homes than have been estimated and other sites will release housing. A good example is Green Park Station where there is a large volume of housing to be included in the Sainsbury proposals and, on the opposite side of the road within the Town Centre area, is a site which is now planned for 500 student rooms. This will potentially release 500 family homes within the City.

There has been inadequate research and an inadequate understanding of housing patterns and needs within B&NES and, for this reason, the badly-flawed Core Strategy in respect of housing in the Core Strategy should be rejected.

I would ask you please to bring this letter to the attention of the Inspector.

**Change to the policy requested:****Respondent Number:** 969 **Comment Number:** 1 **Respondent Name:** Eric Snook**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

As a resident of Midford for 35 years, and living on B3110 next to the mill house, I will object most strongly to any other housing that affects the close periphery of Bath. I believe we are the only city of a population of more than 70,000 and because of its historic problems we do not have one ring road which means that all traffic has to go through the surrounding villages and the city of Bath.

I have always opposed more traffic passing through our outlying villages, many of which do not have traffic restrictions, or if they do, they are not enforced. We only have to take the example of the A46 bypass, which was done many many years ago and not allowed to continue across the meadows at Bathampton onto the A36. This would have relieved much

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

congestion of traffic all around the area of Bathampton, Bathford, etc.

Bath city must be the number one from a point of view of architecture, its compactness and its inability to cope with more traffic for parking. We need much further discussion on the future of the city and its surrounding area, as to future employment and commercial activity.

Any further development of housing should be put on hold until these further points have been solved. There should be more consultation with the public from other people that are going to suffer the consequences if these decisions are taken. I do believe there should be a meeting with all the village councillors and local business people to be involved, so I do hope the decision will be to put everything on hold.

**Change to the policy requested:**

<b>Respondent Number:</b> 1206	<b>Comment Number:</b> 2	<b>Respondent Name:</b>	<b>Respondent Organisation:</b> Freshford Parish Council
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>		<b>Attachments sent with the comment?</b> <input type="checkbox"/>	

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

This amendment is to replace Policy B3A of the former Placemaking Principles for this site. B3A stated that .."potential harm to designated heritage assets should be avoided and, in addition, all opportunities should be taken to avoid or minimise harm" ... .

The amendment appears to start out with the same intention and goes into much more detail. However, whilst the words are comforting and there is the assurance that so far as The World Heritage Site and The Wansdyke are concerned, plans to achieve this aim will be discussed with English Heritage there is no comfort to be gained from how the adjacent length of the Wansdyke has already been encroached upon by building. Furthermore, section 7 of this amendment speaks of transport and lists an alarming degree of new access routes for all modes of transport, from pedestrian to cars. It talks of new accesses from South Stoke Lane and unspecified enhancement of the junction by the Cross Keys.

**Change to the policy requested:**

Any development should be sufficiently clear of The Wansdyke to maintain its setting as an Ancient Monument.

Access to any development should be reconsidered. There should be none from Midford Rd; this would give the best chance of maintaining the Wansdyke's setting and the preservation of the South Stoke CA

<b>Respondent Number:</b> 1348	<b>Comment Number:</b> 1	<b>Respondent Name:</b>	<b>Respondent Organisation:</b> Monkton Combe Parish Council
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>		<b>Attachments sent with the comment?</b> <input type="checkbox"/>	

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

The Parish Council considers that the permanence of the current Green Belt should be sacrosanct and are concerned that removal of parts in a neighbouring parish and elsewhere in the World Heritage setting of Bath are proposed in these amendments to the Core Strategy.

CSA.20 - The World Heritage setting of the City of Bath is a rural landscape in which there are distinct Cotswold villages, among which are Monkton Combe and South Stoke. The separation of these villages from the city of Bath is crucial to both the setting of the World Heritage site, and the setting of the Conservation Areas of these villages. The Green Belt surrounding the City of Bath provides this crucial separation, and the permanence and protection of Green Belt is a key statement in the National Planning Policy Framework, all of the main purposes of Green Belt identified in the NPPF apply to these areas protecting our villages.

CSA.21 seems to confirm our position that Green Belt boundaries once established should not be altered, and yet that is exactly what is proposed here.

CSA.22 is nothing more than a catalogue of the harm and threats this proposed change brings with it. It is not possible to mitigate this harm, the heritage asset is either harmed or it is not. Building houses within this Green Belt land will cause harm.

In conclusion, Monkton Combe Parish Council considers these amendments to render the Core Strategy as UNSOUND. They remove the important protection needed for our villages and the World Heritage setting of the City of Bath. If the Green Belt boundaries can be changed on this occasion, then they can be changed again, when another set of reasons can be set out as some form of justification. The next Core Strategy is only 13 years away, with a review in the interim. What area of Green Belt will next be considered appropriate for development?

**Change to the policy requested:**

No land should be removed from the Green Belt in order to provide housing, much less land which is also contributes to the World Heritage Setting of the City of Bath, contributes to the Setting of a Conservation Area, and additionally in this case is also an Area of Outstanding Natural Beauty, and forms the setting of a Scheduled Ancient Monument.

These amendments to the Core Strategy need to be changed to provide a higher proportion of affordable housing delivery and the use of other sites, such as existing brown field sites, to remove the need for this unjustified loss of very important Green Belt.

**Respondent Number:** 1525 **Comment Number:** 3 **Respondent Name:** **Respondent Organisation:** South Stoke Parish Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

CSA/22. Policy B3a. Defines the basis on which land would be taken from the Green Belt on the Odd Down/South Stoke Plateau, sets out the 'Placemaking Principles' and seeks to show how some of the obvious harm that would ensue might be mitigated against.

South Stoke Parish Council has now engaged The Environmental Design Partnership, of Cirencester, to consider carefully the possible effects on this extremely sensitive area, which through National and International legislation enjoys the "Highest level of protection against inappropriate development" [Ref NPPF paras 79/80 & 131/132] and to report on their findings in detail.

The Parish Council will send this report separately as this particular 'online' format is not appropriate for such a document.

The Parish Council would however draw The Inspector's attention to the following points, which will be amplified by our Consultants in due course.

Green Belt/AONB.

Development in the Green Belt and AONB is defined in the NPPF [paras 79 to 88] as 'inappropriate' unless "very exceptional circumstances exist", which might outweigh the harm so caused.

Development within the setting of a Heritage Asset, such as the Wansdyke, World Heritage City of Bath or The Conservation Village of South Stoke can only be allowed in "wholly exceptional circumstances" [NPPF para 132].

The Parish Council does not believe these circumstances have been proved to exist. If proof is forthcoming then it will be essential to minimise the harm to these priceless assets. (See later paragraph).

WHS Buffer Zone.

BANES have for many years argued that the WHS did not need a buffer zone because its important setting was protected by the Green Belt and Cotswold AONB, which almost completely surround it.

BANES Core Strategy and these amendments now propose to ignore UNESCO's requirements and build on this precious setting. What is the point of carefully considered and long established Legislation to protect our invaluable Heritage if they can be so easily set aside?

The Secretary of State, Eric Pickles, declared on March 26th 2013 the following in relation to his Government's new NPPF- "Our reforms safeguard our glorious green spaces and countryside. They protect the green belt - that vital green lung that prevents urban sprawl. And they defend Areas of Outstanding Natural Beauty, and other important environmental designations. Nothing will change that today. Nothing will change that tomorrow."

In a Written Ministerial Statement on July 1st 2013 entitled Planning and Travellers, Brandon Lewis, Local Government Minister, stated –

"Having considered recent planning decisions by councils and the planning inspectorate, it has become apparent that, in some cases, the Green Belt is not always being given the sufficient protection that was the explicit policy intent of Ministers. The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for traveller sites or for conventional housing, is unlikely to outweigh harm to the green belt and other harm to constitute the "very special circumstances" justifying inappropriate development in the green belt."

The Parish Council asks that this clear interpretation of Government Policy be applied here in BANES' Core Strategy policy amendments, in relation to GB, AONB, WHS, South Stoke Conservation Area and The Wansdyke.

Ecological Requirements.

CSA/22/5 makes particular mention of the importance of "Dark Skies". Development on the Plateau will lead to uncontrolled light spillage and a significant extension of the existing Light Loom that hangs over the City. Mitigation against this is impossible. Even with new high spec lights the Park & Ride is visible from miles away.

The same clause states blithely "Safeguard skylark interest". These are comparatively rare, shy, ground nesting birds. They populate open countryside pastures. How can their interests be safeguarded in a built environment?

The Parish Council believes it is disingenuous to suggest that a few careful words can mitigate against these obvious harms.

Landscape Requirements.

The Parish Council is particularly concerned about the substantial harm that would be caused to the current Conservation Area of South Stoke Village and even more so about the even greater harm that would be caused to the wider conservation area confirmed in BANES' Conservation Area Appraisal (May 2011), which is currently in the last stages of formal adoption.

World Heritage Site.

In CSA/22/6 it is suggested that parts of the area proposed for removal from the Green Belt might remain undeveloped to limit the harm to the WHS. The Parish Council believes that if this land is to remain undeveloped it should remain undeveloped in the Green Belt. Otherwise it will certainly be developed in the not too distant future. It is also suggested that the Eastern boundary will be defined in the later Masterplan. If this development of up to 300 houses is proven essential, its boundaries need to be defined precisely at the outset. Failure to tackle this now will guarantee a gradual

increase in numbers over time on one pretext or another.

The Wansdyke.

It is clear from all major studies of the Wansdyke that there was irreparable harm caused to its setting by the careless treatment accorded to it by the Sulis Meadows development. This is a Scheduled Ancient Monument and should be accorded the highest level of protection. The Parish Council believes that any development on the Plateau to the South of the remaining section from the Cross Keys to Sulis Meadows would cause substantial harm and should therefore be prevented.

South Stoke Conservation Area.

The designation of South Stoke as a Conservation Village is a significant acknowledgement of the importance of this distinctive 'Cotswold' Village. Limiting the 'height and density' of development cannot adequately avoid or minimise the harm that any development on the open Plateau Land East of Sulis Manor would cause. For centuries the Northern boundary of South Stoke has been the Wansdyke. To avoid further irreparable harm the remaining open section from Sulis Meadows, East to the Cross Keys must remain so for all time.

Access & Transport.

In CSA/22/7 it is suggested that an access to the site might be possible from Southstoke Lane. This would be disastrous. The Lane has barely adequate width at present for two cars to pass. Any widening or improvement to it would ruin a special access to the Conservation Village and would significantly increase traffic flows and speeds. There has already been a near fatality on this very stretch of road in recent years.

Local Employment.

In CSA/22/9 it is suggested that additional local employment could be encouraged by redevelopment of Manor Farm. We presume this is intended to mean 'Manor Farm Buildings' as 'Manor Farm' itself is in the core of the current Conservation Area of South Stoke.

Manor Farm Buildings are a varied range of substantial old stone and more modern lightweight structures. These could only be found new uses in their Green Belt setting through the normal Planning system, as defined in the NPPF. However they are in a sensitive location on the very edge of the Cotswold escarpment and overlooking the invaluable South Stoke Millennium View Point and public footpath. Any substantial re-development there would therefore be unlikely to be acceptable for the harm it would cause through light pollution, disturbance to the Conservation Area and the increase in traffic on Southstoke Lane.

For the reasons stated above, South Stoke Parish Council believes that the amendments to BANES Core Strategy catalogued in CSA/22 make the Core Strategy unsound.

**Change to the policy requested:**

South Stoke Parish Council, for the reasons stated above, is of the opinion that the inclusion of a proposal to create a development of 300 houses on the Odd Down/South Stoke Plateau makes this Core Strategy unsound.

However the Parish Council recognises that, if despite the evidence to the contrary, it is proven that "very special circumstances (and for Heritage Assets "Wholly Exceptional Circumstances") do exist, then a sensitive development may have to be accepted. In the event that that is the case, it would be essential that the development that followed would not extend to the East of Sulis Manor at all. To do so would have a direct and extremely harmful effect on South Stoke Conservation Area, The Wansdyke Scheduled Ancient Monument and The Setting of the World Heritage Site. It would lead to the coalescence of the Rural "Cotswold" Village of South Stoke with the City of Bath.

**Respondent Number:** 1993 **Comment Number:** 1 **Respondent Name:** T.H. Geake

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

I object to the amendments that Bath And North East Somerset Council is making to its Core Strategy.

Specifically, in Change Reference CSA 22 the Council is removing much more land from the Bath Green Belt than is required for the intended three hundred homes. This clearly indicates a decision to build many more houses. This is in clear disobedience to Government policy. In a Written Ministerial Statement on 1st July 2013 entitled "Planning and Travellers" Mr. Brandon Lewis MP, Parliamentary Under Secretary of State for Communities and Local Government stated, "The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for traveller sites or for conventional housing, is unlikely to outweigh harm to the green belt and other harm to constitute the "very special circumstances" justifying inappropriate development in the green belt."

Specifically, in deciding to build on Green Belt and Area of Outstanding Natural Beauty Land, Bath And North East Somerset Council is contravening its own and Government policy that "Brown Field" sites should be developed before Green ones.

Specifically, in Change Reference CSA 22 the Council intends to permit further industrial and office development at Manor Farm in clear disobedience to the Government policy cited above. (Paragraph 9).

Specifically, in Change Reference CSA 22, the Council is offering to "avoid built development in areas that would cause substantial harm to the Wansdyke." (Paragraph 6). This is almost impossible, given the requirement for street lighting in paragraph 6 to allow safe vehicular and pedestrian traffic along the new highway system from the Cross Keys public house, perhaps via South Stoke Lane.

The commitment to a dark sky policy is denied by Bath And North East Somerset Council in its application to itself for planning permission for illuminated advertising on the north east corner of the South Stoke Plateau.

I could continue, citing intended disobedience to Government policies in your changes CSA 23 and CSA 24, but this letter is already at the limit of the reading endurance of an official as senior and busy as you. Alternatively I may be causing excessive consultancy fees if this letter has been passed to an outsource for perusal .

**Change to the policy requested:**


**Respondent Number:** 2012 **Comment Number:** 2 **Respondent Name:** Steven Gourley

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**Support: 

The proposal to build on land adjoining Odd Down is both unsound and extremely harmful to Bath and its environment and cannot be considered sustainable. The total housing delivery number should be reduced in accordance with the provisions in the NPPF to remove the need to build on this land and so avoid this harm.

According to the evidence supplied by B&NES, any housing development of any scale on this site will cause harm:

- Damage to the setting of the World Heritage Site of Bath
- Further endanger protected species of horseshoe bats and skylarks
- Coalescence of Bath with the village of South Stoke
- Further destruction of the Wansdyke scheduled ancient monument
- Open down views from Bath would be lost.

The irreversible damage that this represents is completely out of proportion to the 75-120 affordable homes that might

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

be built as a result of this proposal.

In any case, this land is designated AONB – not just Green Belt. This designation reflects the view that Bath is a special case. B&NES justification for building here seems to be that there is nowhere else to build their target number of houses. Yet their justification of the total housing delivery target is flawed anyway since it greatly exceeds their forecast of demand. Consequently, this proposal to build in the AONB is unsound since it is inadequately justified.

I am also concerned that this proposal is undemocratic and contradicts the principles underlying the NPPF. Specifically, B&NES council have not voted on any part of this plan since March 2013. Yet this proposal explicitly contradicts motions passed by full council:

1.The council (reluctantly) voted to permit development of 300 houses on this land and yet the Green Belt is to be rolled back to permit the development of far more houses than this without any provisions or controls to limit the numbers or phase the development over the period of this plan and the next – as appeared to be intended by the inspector’s recommendations.

2.The council voted to include a buffer zone between the development and the village of South Stoke and yet these amendments permit development within 120 metres of the current South Stoke Conservation Area and with NO buffer zone with the new Conservation Area boundary proposed by the most recent conservation area appraisal.

To allow these contradictory changes to go to public consultation without proper scrutiny by our elected representatives is a poor precedent to set and surely must be considered unsound.

**Change to the policy requested:**

All reference to building on the land adjoining Odd Down should be removed.

**Respondent Number:** 2563 **Comment Number:** 1 **Respondent Name:**

**Respondent Organisation:** Guinness Trust

**Agent ID:** 43 **Agent Name:** Tetlow King Planning

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

On behalf of the Guinness Partnership we express our support for the proposed Green Belt alteration and accompanying policy text (Policy B3A) to accommodate an urban extension at Odd Down. These amendments are listed in your Schedule against Change Ref. CSA22.

We have consistently called for such amendments to be made, recognising (as has the Inspector) that they are an integral component of the broad spectrum of revisions necessary to make the Core Strategy sound.

**Change to the policy requested:**

**Respondent Number:** 2565 **Comment Number:** 2 **Respondent Name:** Andrew Bolden

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

NPPF requires that a case for exceptional circumstances needs to be made before development is considered in Green Belt or AONBs. Neither the current "Schedule of Suggested Changes" nor the earlier consultation In May 2013 has made any case for exceptional circumstances.

No exceptional case has been made to justify altering the Green Belt Boundary so CSA22 is flawed in making any proposals for housing development on the South Stoke plateau. By not making an exceptional case the policy is contrary to NPPF and is therefore unsound.

The area of land proposed to be lost from the existing Green Belt urban area greatly exceeds that required to accommodate 300 dwellings at the density of 35-40dph indicated. However in CSA21 it is stated that no land can be safeguarded for longer term development. This implies that instead of 300 houses the Council is in practice seeking to make provision for 650-700 dwellings within the altered boundary within the shorter rather than longer term.

Mention in point 7 of a potential need for vehicle access to the site from Southstoke Lane necessitating an upgrade of the Cross Keys junction further illustrates an aspiration for greater development than 300 houses. This potential need for an access should be fully excluded as it is immediately contradictory to several of the other aims such as minimising impact of South Conservation area and its setting, risk to dark skies, the character of South Stoke Lane etc.

It is wrong that CSA Refs fail to mention that the protection the land has by virtue of being AONB. NPPF expects this to be afforded the "highest status of protection". The Schedule of Suggested Changes as a whole is unsound in not recognising or discussing this aspect of the NPPF requirements (Sections 115 and 116).

**Change to the policy requested:**

The fundamental failing of the Schedule of Suggested Changes (and the preceding consultation) is that no exceptional case has been made for developing on Green Belt or in AONB.

There is almost no recognition of the existence of the AONB in the consultation. It is as if it is not a material consideration but NPPF requires that it should be

Proposals for developing on the Odd Down Plateau should therefore be struck out.

<b>Respondent Number:</b> 2611	<b>Comment Number:</b> 1	<b>Respondent Name:</b>	<b>Respondent Organisation:</b> Transition Bath
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>		<b>Attachments sent with the comment?</b> <input checked="" type="checkbox"/>	

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**Support: 

Transition Bath strongly supports the proposed Sustainable Construction Standards at all the sites. We feel that building to these higher standards will reduce future carbon emissions, occupiers' exposure to rising fuel costs and their volatility, reduce fuel poverty and overall is a very sensible economic policy.

The monetised energy savings to home owners easily offset the additional capital costs, which are not borne by the developers but by the sellers of the land. Recent land sales of greenfield and brownfield sites in Bath at £1.9M and £2.5M per hectare are significantly above the government's viability benchmark levels of £300K and £800K per hectare suggest that the additional capital costs of between £6.5K and £10.5K (ref 1) of building to Code for Sustainable Homes 5 which have significantly reduced in the last few years will not act as a barrier to land being brought forward for development.

A recent survey by Curo for the redevelopment of the ex-MOD site at Foxhill in Bath where 700 homes are to be built put Sustainable Low Energy homes as the second top priority for local residents after Affordable Homes; we feel the requirement for building homes more sustainably is backed by the majority of B&NES residents.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

Ref 1: [http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/EP059%20Costs%20of%20building%20to%20the%20Code%20for%20Sustainable%20Homes%20\(Sept%202013\)%20\(draft\).pdf](http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/EP059%20Costs%20of%20building%20to%20the%20Code%20for%20Sustainable%20Homes%20(Sept%202013)%20(draft).pdf)

**Change to the policy requested:**

**Respondent Number:** 3095 **Comment Number:** 2 **Respondent Name:**

**Respondent Organisation:** CPRE Avonside

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

Odd Down / Southstoke

The development of this site would be highly damaging, and this is recognised in the very many levels of legal protection afforded to the land. Some or all of the site is in Green Belt; in an Area of Outstanding Natural Beauty; a Scheduled Ancient Monument; a Site of Special Scientific Interest; a site of importance for bats; and in the Setting of the World Heritage Site as defined by the World Heritage Site Setting SPD. It is hard to imagine a site with more layers of protection in planning terms. We therefore feel strongly that the damage to the Green Belt, AONB, SSSI, Ancient Monument, WHS Setting and general environmental assets outweigh the advantages of removing it from Green Belt.

**Change to the policy requested:**

Odd Down / Southstoke

Notwithstanding our overall objection to the removal of this site from Green Belt, we feel that the consultation proposal lacks sufficient detail to be sure of minimising the harm done by development. We would like to see considerably more direction given to developers in terms of the quantity and placement of housing within this site. The area proposed for removal from Green Belt is considerably larger than would be required for 300 houses. An indicative housing boundary ought to be shown, placing the housing to the west and north of the site where it would minimise loss of the Green Belt that separates Bath and Southstoke, and where it would be closest to the Park and Ride site, allowing the best possible pedestrian access to public transport links.

**Respondent Number:** 4139 **Comment Number:** 1 **Respondent Name:** Mrs Sue Lockert

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I think the Green Belt land to the rear of Midford Road and Southstoke should be kept as Green Belt. The plans show area EF & DC.

The area is a particularly attractive part of Bath and it would be a disaster if the land was put to different use and eventually developed as housing or built on at all. The Wandsdyke also runs along this land. As Bath is a World Heritage Site it is important to retain this area in its present form.

There may be a shortage of affordable housing in Bath but much of the problem arises from students who occupy private

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

houses in areas such as Oldfield Park. here are between 20,000 and 25,000 students in Bath. The MOD premises at Foxhill and other sites are being closed so why not develop these sites for housing. The students do not contribute financially to the city because they do not pay council tax. The landlords do not have to pay a business rate for letting out these houses so two forms of revenue are lost. I realise that it would require an Act of Parliament for the law to be changed.

Bath was de-faced by impractical re building after the second world war. Perhaps we should learn from the lessons of the past. Please do not let the Green Belt be used for development. Once the land is gone it will be gone forever and that would be a tragedy.

**Change to the policy requested:**

**Respondent Number:** 4459 **Comment Number:** 1 **Respondent Name:** Keith Biggs **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

All proposals for South Stoke / Odd Down remove land from 'protected' Green Belt and AONB. Object most forcibly! (I worked as a Cotswold warden in Avon Valley AONB for over 30 years. Our aims to protect & enhance the AONB circling Bath. My 'patch' was South Stoke and Combe Hay parishes.

Your plans for development in this area directly conflicts with AONB and must be abandoned.)

**Change to the policy requested:**

Abandon any proposals to remove land at South Stoke from Green Belt and AONB.

**Respondent Number:** 4466 **Comment Number:** 1 **Respondent Name:** Mrs Julia Beardshaw **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

Disagree with Odd Down/South Stoke plateau being taken out of greenbelt and used for housing.

- Bath's UNESCO world heritage status and tourism business will be adversely affected by this development.
- Believe there are sufficient brownfield sites that could accommodate Bath's housing needs if houses were built in sufficient density – developers are currently proposing densities less than areas such as Sulis Meadows where affordable housing was previously built.
- Odd Down/South Stoke plateau is also a Cotswold Area of Outstanding Natural Beauty and I do not believe it can be built on without going through due legal process – which has not occurred.

**Change to the policy requested:**

Removal of Odd Down/South Stoke plateau from housing development plans.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 4467 **Comment** 1 **Respondent** Judith Parfitt  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

Taking Green Belt, using AONB and developing this site contravenes the latest national Planning Policy Framework since the land being sequestered is far in excess of the land that BANES claim to need for 300 houses. Therefore there is no exceptional need to make this change. The law would be flouted.

UNESCO require a BUFFER ZONE, but once the Green Belt and AONB is eroded at the Odd Down site we have no buffer left

**Change to the policy requested:**

The Green Belt and AONB MUST remain at Odd Down site, which is in effect the Buffer Zone and a statutory requirement. Already this site is very narrow- too narrow.

The number of projected houses on this precious site does not fit the site that BANES would convert from Green Belt. Other outlying towns are not World Heritage Sites and which therefore WANT extra houses. Bath is already at its population capacity for its setting. The acreage requested shows an intention to increase the number of houses possibly 650 to 900. If 300 houses are the required new build size, then other ( brownfield ) sites can be found.

Total assessment of this Heritage Site is imperative. Some of the Heritage Assets of this site are in evidence, but further research is showing that more heritage sites are emerging. This would increase Bath's World heritage Status. Truly this South Stoke Plateau is a very important heritage area and inappropriate development so near to South Stoke would lose it all for ever.

South Stoke Lane is a narrow country lane, and already the site of bad accidents. It cannot take busy traffic, ie, a rat-run to the A367.

Manor Farm seems set for development to give employment, which is totally inexcusable in Green Belt.

BANES have spent large sums of money protecting bat nesting and foraging sites, especially in this area, and now glibly propose to concrete over. Green fields and dark skies are fundamental for the site protection

**Respondent** 4469 **Comment** 1 **Respondent** Faith House  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

The proposed change is unsound and unsustainable.

It is unsound because it has been rushed through consultation without allowing adequate time for the changes to be properly publicized or explained to the communities affected by them. For example a road show was launched immediately and included exhibitions within the first week of the consultation. These were not announced until after the changes were published. This did not allow any time to publicise or alert people to come to the exhibitions.

The change is also unsound because the information provided does not properly explain what the changes will mean in practice. Why, for example, has so much land been allocated at Odd Down for only 300 dwellings? It is contrary to the principles set out in the NFFT and the policies adopted by the Council in the Core Strategy. I set out the reasons for this view below.

#### The Green Belt

CSA22 deals with the proposed implantation of a policy to expand the city of Bath in order to build 300 dwellings on fields within the existing Green Belt. This apparently is required in order to provide just over 4% of the targeted number of housing over the next 15 years. This would constitute inappropriate development and it should not be approved except in very special circumstances, as defined in clause 88 of NPFF.

#### Policy B3A

300 or 700 dwellings? This sets out as the first placemaking principle that the proposed development should be for 300 dwellings. The measurement of the area of land which is to be allocated is not stated but it is apparent from comparing it to the previous development at Sulis Meadows that the land allocated exceeds the area required for 300 dwellings by a margin of over 100%.

The Council states in paragraph 6.63A of the Core Strategy that that none of the land is safeguarded for future development. It is therefore unclear why the allocation of land exceeds the amount required for 300 dwellings. The implication, if all that the land is to be used, is that the intention is that very substantially more than 300 dwellings will be built.

#### Access to the site

Principle 7 of Policy B3A states that there is a potential vehicle access from South Stoke Lane which would require upgrading the Cross Keys Junction. This understates the issue of access which is readily apparent from the diagram in CSA23. There is no vehicular access to nearly 3/5 of the proposed site without using South Stoke Lane. The remainder of principle 7 fails to acknowledge the fact that upgrading South Stoke Lane to accommodate the traffic generated by the housing on the site would adversely affect the existing dwellings along South Stoke Lane, as this would require upgrading the road to allow sufficient flows of 2 way traffic. It also fails to comprehend the effect this would have on the Green Belt/ Area of Outstanding Natural Beauty, which will remain between the site and the Cross Keys.

#### Wansdyke

This is shown in the top right hand section of the allocated area. Principle 6 states that the policy should avoid built development in areas which would cause substantial harm to the Wansdyke [emphasis added]. The principle should state that any harm to this SAM should be avoided. It is difficult to see otherwise how this would square with policy B1 in the Core Strategy.

It also contrary to the guidance in NPFF clause 132 which states that any harm or loss to a designated heritage asset requires clear and convincing justification. None is provided. The Wansdyke has for centuries marked the northern boundary of South Stoke Village. It should remain so and the land between the Wansdyke and the village should remain in the Green Belt.

#### World Heritage site

Principle 6 states that the southern boundary shall remain undeveloped to limit the visibility of the development.

The land within the allocated area forms part of the buffer zone to the World Heritage site. The natural land boundary will be the line of the escarpment instead of the existing line of housing at Sulis Meadows. The extension of the urban area - however sensitively this might be done - constitutes a permanent encroachment into this buffer zone.

The proposed development in the allocated area will constitute substantial harm to the WHS and in accordance with NPFF clause 132, this should be wholly exceptional. The policy in B3A completely fails to meet the criteria in clause 133 of NPFF.

#### Area of Outstanding Natural Beauty

This is not addressed in policy B3A. Nothing put forward in the Core Strategy (as amended) addresses or justifies the sacrifice of this part of the AONB to provide 300+ dwellings, which is just over 4% of the housing target which the Council has identified.

**Manor Farm**

This area will remain within the Green Belt. This is earmarked for additional local employment through conversion and redevelopment. This area includes an open field. It is not clear from principle 9 or CSA23 how this land will be redeveloped. It abuts the escarpment and is therefore in a very prominent position in relation to the Cotswolds AONB, the World Heritage Site and the Millennium Viewpoint.

**South Stoke Village**

The allocated area as shown in CSA23 is only a few hundred feet from the existing South Stoke Conservation Area. This designation acknowledges the importance of this distinctive Cotswold Village. It should be protected from inappropriate development. The building of housing within the allocated area will leave no effective physical separation between the proposed urban expansion and the village of South Stoke. Policy B3A does not address the issue of separation as this will no longer be possible.

CSA22 will lead to loss of the identity of South Stoke Village as a separate community. It will become an annexe to a new housing development.

**Ecology and wildlife**

Policy B3A principle 5 purports to address these issues but it does not acknowledge that:

- 300 dwellings and the access roads will require street lighting and the permanent loss of the dark skies which presently exist
- the ground occupied by housing and roads will be lost as habitat
- the noise and light caused by this development is likely to disturb the rare species of bat which presently use the allocated land as a foraging area

**Change to the policy requested:**

<b>Respondent Number:</b> 4476	<b>Comment Number:</b> 1	<b>Respondent Name:</b> MRS C H Hollingworth	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>		<b>Attachments sent with the comment?</b> <input type="checkbox"/>	

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:** Support:

I object strongly to the proposed changes to the Green Belt adjacent to the Wansdyke for the following reasons

Green Belt/AONB ref NPFF Clause 79 to 88

This area of Green belt from Combe Hay lane to the Midford Road forms a lovely and vital green edge to Bath from which you get splendid views and is an important amenity to those who live in this area of Bath. The current houses are fairly well screened from the edge of the plateau and it is possible to feel in deep countryside very quickly as soon as you walk along its edge or just below it. There are several small communities and farms below whose rural peace and enjoyment would be destroyed. Any housing and all the roads and other infrastructure needed would totally destroy this precious rural area on the edge of Bath . It is a special green space and also preserves the separate village of South Stoke.

Development Plan (BANES ref CSA22 and their Green Belt diagram CSA23 Annex 1page 570)

To take away so much land from the Green Belt right to the edge of a well-known ridge will totally destroy the nature of this small area of Bath which is what seems to have happened to the Combe Down area. It is just a question of a few extra houses but the roads that will take even more land to service them.

Site Access and Transport: BANES ref CSA 22/7 p2

Very little has been said about the huge extra amount of infrastructure needed to support so many more houses - it will

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destroy a great many trees and green areas in order to direct the traffic not only on to the A367 but also the Midford Road near the Cross Keys pub. The traffic along the Wellsway and Midford road is now almost a t standstill in the rush hour and outside it. An inordinate amount of extra road and roundabouts will be needed to access the proposed site using a lot more land and Green Belt. The whole nature of the Sulis Meadows estate will be destroyed.

It would also seem a new bus route with wider roads etc will be required and possibly a new petrol station and other services will be required. I am not even sure if the impact on local primary schools has been considered if any one is able to afford the new houses.

When Sulis Meadows was created not much extra facilities apart from the surgery was put in but several hundred more houses is a different matter. Sulis Meadows is a popular and unique estate now in Bath as all the houses have proper parking spaces whereas many other new estates within the city have been created with poor parking facilities for residents. It is no good pretending people are not going to have cars. If the new estate is designed with few off road parking for each property it will be totally impossible for public transport to get round- the Banwell estate is very badly designed.

World Heritage Site Buffer Zone.

Bath is the only World Heritage City in England and has to have a buffer zone. understand that the Council says the Green Belt protects it but now it is proposed to remove it. Why create the Green Belt if it can be removed at any time?

Heritage Assets CSA 22/6p19 ref NPFF Clause 132

The proposal will move the boundary protecting the Wansdyke, a national monument that runs through from St Gregory's School to the Cross Keys Pub. This will be destroyed for ever if housing is permitted all the way from Combe Hay Lane through to the Midford Road and destroy not only this monument but one of the few unspoilt plateaus left around Bath in that the other one running along the Old Fosse Road and Rush Hill.

Ecology/Wildlife ref CSA22/5 p18

The area is used as a foraging area for an endangered species eg Horseshoe bat. They use the trees, but would be hindered by light and noise of any development. The skylark, also endangered, uses the area as a breeding ground. Dark skies are fundamental to retain the beauty of this landscape. Mitigation of these issues is not possible.

There are already very bright lights over Gregory's School and on the Sulis Manor Road - more light nearer the edge of the plateau would destroy this area and probably affect the area below it too as so many new access roads would be needed it could be disastrous for this area. The peaceful atmosphere for the plateau and the area below it would be destroyed.

**Change to the policy requested:**

**Respondent Number:** 4478 **Comment Number:** 1 **Respondent Name:** Mr & Mrs Bulley

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-

GREEN BELT/AONB:

Building on any Greenbelt land is wrong, but building on the Greenbelt land next to the Wansdyke is definitely in contravention of the National Planning Policy Framework unless there are exceptional circumstances and these can be proved to exist, this is also a Scheduled Ancient Monument and there is also a clause which says "wholly exceptional circumstances please see ref NPFF Clause 79 to 88. If we lose this Gree Belt land we also lose the area for producing food

which means rather than increasing our output we will be decreasing it, and once this land is lost to agriculture it will never be regained.

**WORLD HERITAGE SITE BUFFER ZONE:**

The World Heritage City of Bath does not have a buffer zone because BANES says it is protected by the Green Belt and AONB areas surrounding the City, so why can they now decide that this is not necessary as UNESCO require a buffer zone but if the Green Belt at the Wansdyke is removed it means that BANES has failed to provide one.

**HERITAGE ASSETS:**

The concept diagram shows the Green Belt has been moved see CSA 22/6p19 and ref NPFF Clause 132, but if this area is to remain undeveloped why are the boundaries being moved putting the Wansdyke in danger as would be the South Stoke Conservation Area. Why should the boundaries be moved at all.

**DEVELOPMENT PLAN:**

If the number of dwellings required in the Sulis Meadow area is only 300 then why is the area outlined on the recent plans (see BANES ref CSA22 and their Green Belt diagram CSA23 Annex 1 page 570) so much larger than needed? Is it because BANES are planning a much larger development in the future? (BANES ref CSA22 and their Green Belt diagram CSA23 Annex 1 page 570) If the MOD sites were to have the density increased to 45 per hectare the same as Sulis Meadow then there would be no need to build on the Green Belt at all!

**SITE ACCESS AND TRANSPORT:**

The map also shows a "potential access road" to the new development along Brantwood's northern boundary to South Stoke Lane. This lane is very narrow and would not be able to cope with increased traffic. The access would then need to be from the West, next to the Park & Ride. If access were to be granted from the East then we would certainly lose the Green Belt to urbanization in a very short space of time. The increased traffic flow which would be caused by improving the Cross Keys junction means an increase the traffic flow through the village to a dangerous level. BANES ref CSA 22/7 p21.

**EMPLOYMENT POSITION:**

The shaded area around Manor Farm buildings imply development for "Employment purposes". This whole area is within the Green Belt and therefore comes under the rules set out in the NPPF (clause89). They currently have planning permission for the current uses, but to increase this usage would seriously damage the Green Belt AONB World Heritage Site and not to mention the glorious setting of the Millenium, Viewpoint (see CSA 2/6 page 21&22).

**Ecology & Wildlife**

The area is also a foraging area for a rare species of bat, the noise of construction and increase of urbanization would seriously damage their habitat and also the damage the breeding grounds for Skylarks which is through this area. To keep this areas dark skies is essential and cannot be lost forever. (See CSA22/5 p18)

We cannot overstate our deep concerns over BANES riding roughshod over the Green Belt rules and regulations rather than to take time to look into using all Brown field sites before any Green Belt land, which has already stated once lost cannot be recovered.

If we as private citizens decided to build on the Green Belt land we would be stopped at the first hurdle, but it seems that the people voted into office to look after the citizens and beautiful World Heritage City of Bath do not care for the wishes of the people.

We urge you to reconsider your plans for this beautiful area

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4481 **Comment Number:** 1 **Respondent Name:** Mrs J A Cowley**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

The invitation to comment on the Core Strategy Amendments does not allow comment on the principle of releasing land but does permit comment on site boundaries and on alternative sites.

There is no need for all\_ or even any, of the sites to be developed. The reason for the whole exercise is to find room for affordable homes. However, the core strategy proposes a much larger development including many more expensive homes at a very much lower density than necessary .

This shift in emphasis appears to come from developers asserting to BANES that low cost housing is not viable unless cross-subsidised by much larger and land-hungry developments. They also find it easier to bulldoze virgin land than to do the groundwork on existing sites. If the proposals do indeed reflect pressure from developers, this should be challenged robustly and full account taken of experience around the country . It is for local and national government, not for developers, to determine basic priorities.

I understand that the identified need for low cost housing could easily be met on other sites, including the former MOD land, at a more than acceptable density and without recourse to the Green belt or to areas of Outstanding Natural Beauty. Even if this argument is only partly accepted the boundaries defined for development in the Core Strategy Amendments are far too wide for any possible need.

It should not therefore be necessary to make specific arguments against the Odd Down/South Stoke site. The Core Strategy Update itself recognises many of them but proposes totally insufficient palliatives .Given the constraints imposed on this consultation and the fact that the main arguments have been aired before I will not go into detail, but among them are:

- It and the surroundings of Bath are a World Heritage Site, the status of which must not be jeopardised.
- It is within the Green Belt and an Area of Outstanding Natural Beauty.
- It is on the Wansdyke, an important Ancient monument.
- It is an important nature conservation area, particularly for rare bats and the rapidly dwindling (and ground-nesting) skylarks.
- The proposed road developments, especially to South Stoke Lane and the Cross Keys junction are wholly out of keeping in a rural conservation area.

**Change to the policy requested:****Respondent Number:** 4482 **Comment Number:** 1 **Respondent Name:** Mrs P Jackson**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

I am writing to object to the proposed 300 + new houses being built on the Sullis Meadow Plateau. Bath is a WHS and the proposed site has the highest protection.

This, together with the also proposed public amenity dump and possibly land fill, on the nearby old Fullers Earth Works would reduce the prices of property in the area and the traffic at Odd Down would be completely congested.

**Change to the policy requested:**

**Respondent Number:** 4486 **Comment Number:** 1 **Respondent Name:** Mr Andrew Stroud

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**Support: 

Green Belt Proposed development of 300 houses is all on green belt. According to National policy frameworks "great importance" is attached to green belts one of which is to prevent neighbouring towns from merging into one another. Whilst southstoke is a village the proposed site for development will inevitably lead to the merging of this historic village with the city of Bath. According to the council's own report the green belt between Southstoke and Bath is already narrow. Greenbelts are also to assist in safeguarding the countryside from encroachment this development would result in the opposite. On this basis alone the amended draft core strategy fails this test.

AONB The proposed area lies within AONB .An AONB by definition is a precious landscape whose distinctive character and beauty are so outstanding that it is in the nation's interest to safeguard them; and according to defra guidelines relevant authorities will be expected to have regard to purpose of AONB how will building 300 homes do this? The proposed amendments are in direct opposition to the safeguarding of the natural beauty of the Southstoke landscape. The assessment undertaken for the council by Arup states concerns about the impact on the rural setting of the Southstoke conservation area.

The Wansdyke The Wansdyke is a Scheduled Ancient Monument. The development at Sulis Meadows has already caused extensive damage to the Wansdyke and further development along it is likely to have an even greater detrimental effect. As sited in the Arup report crossing the Wansdyke again with development further weakens its historic role as a barrier to urbanisation in this area. Again the amendment is unsound.

Wildlife A large part of the plateau is a foraging ground for the Greater Horseshoe Bat, building 300 houses with the inevitable increase in traffic and light pollution will have a deleterious effect on a species which is the rarest mammal species in the UK. The main threats facing them are loss of roost sites and foraging areas. Building 300 houses on a foraging area will only place more strain on their survival.

Inevitably building 300 houses on the Southstoke plateau will lead to the development of this whole area and cause immense harm to the Wansdyke, Southstoke village and its wildlife

**Change to the policy requested:**

I would like BANES council to remove change from its amended draft core strategy

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4488 **Comment Number:** 1 **Respondent Name:** Mrs A. Green**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

I have noted the recent amendments to the proposed changes to Bath's Green Belt in the Odd Down South Stoke area, but still believe that Bath's Green Belt should remain intact.

The National Planning Policy Framework indicates that only in exceptional circumstances or wholly exceptional circumstances where Heritage Assets such as Scheduled Ancient Monuments are present should new building be permitted in Green Belt and AONB areas. The Wansdyke is classed as an Ancient Monument and the entire area surrounding it should surely be protected from development. (CSA22/6)

In addition, if the Green Belt is allowed to disappear, this area of the World Heritage City of Bath will no longer have a Buffer Zone as required by UNESCO.

It is hard to justify the existence of exceptional circumstances in this case, as the Total Housing Requirement for the BANES Council area is now assumed to be 8727, of which 3290 are required as affordable homes. It appears that there has been under provision of affordable homes in the current plans for development of the Brownfield sites in the area. Some adjustment could be made, which together with adjustment to plans for housing supply in Wiltshire and Somerset would be sufficient to prevent encroachment on the Green Belt. Given the increasing number of people living alone, I would also hope that provision could be made for smaller housing units. Most of the Brownfield sites available are closer to the city centre and places of employment, which should surely be a factor to be considered from on both environmental grounds and also on financial grounds, given the high cost of public transport.

The proposed development at South Stoke/Odd Down seems to be the first step towards a much larger development, as the area enclosed by the proposed Green Belt boundaries is sufficient for more housing units that are allegedly currently needed. (CSA 22). Creation of the suggested access routes to the new site, besides causing environmental damage, would facilitate urbanisation of a wider area in the future. (CSA22/7)

No consideration appears to have been given in the plans for the needs of ground nesting birds, whose nesting sites would disappear if the development were permitted. The noise and light pollution that would be inevitable in such a development would be very detrimental to all wildlife. No mitigation of such issues is possible. (CSA22/5)

**Change to the policy requested:**

For the reasons stated above and in my previous submission I believe all existing Green Belt areas should remain intact.

**Respondent Number:** 4508 **Comment Number:** 1 **Respondent Name:** Nigel Roberts**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

Introduction

There are many reasons to object to the proposed changes. This land is designated as AONB and green belt and is part of

the world heritage setting of Bath. The land being on a plateau will be visible from many miles away this is especially true on dark nights, the lighting making things apparent, one of the reasons for the lack of street lighting in Southstoke village. Although the council has done work to show that the effect of building can be limited, there is no land that is low impact, as shown by the council's recent evidence to the inspector. The only exception is the land occupied by the current Odd Down football club, land that would be protected by Sports England and by the councils own planning guidance. No attempt has been made to show where the sports pitches could be relocated.

Overall there are many reasons not build on this areas especially consider that a small increase in density on other areas would mean that there is no need to building on the urban extensions at Weston and Odd Down.

#### 1.Greenbelt

1.1.The purpose of Green Belt is to stop the urban sprawl. This development is urban sprawl and could mean Southstoke is linked to Bath. The estate at Sulis Meadows is not closely linked to the rest of Bath, as this could only be accomplished by the destruction of the Wansdyke. This further proposal is a further non linked addition, not helped by the numerous ransom strips owned by Crest Homes around the Sulis Meadows estate. This addition following addition is in our opinion the definition of urban sprawl.

#### 2.World Heritage Setting

2.1.When Bath as a city was designated as a World Heritage site, it was just not the buildings in the city centre that gave it unique character, it is also the setting of the City within the hills that makes Bath. This was one of the reasons why building along the A4 to the Globe was rejected, where transport links would have been better. The same reasons were given for land close to Newton St. Loe. The council assessment shows that large parts of the land on the Odd Down Plateau have medium to high effect on the world heritage setting.

#### 3.Area of Outstanding Natural Beauty

##### 3.1.Paragraph 116 of NPPF states

- Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.

3.2.The land around Sulis Meadows is part of the Cotswold Area of Outstanding Natural Beauty and as such has one of the highest level of protection under NPPF. It needs to be shown that there is national importance in building on this land. The council has failed to show the exceptional circumstances that pertain to allow development in this area.

3.3.NPPF further states building should be considered if there is an effect on the local economy. The calculation of housing numbers for the next fifteen years gives a value of 12,700 required within Bath and North East Somerset, but less than 10,000 required if job creation is just considered, the higher figure being justified on the amount of social housing required. This means that the council's proposals whether there is an effect on the local economy fails paragraph 116 of NPPF.

3.4.Most of the jobs that will be created in Bath will be in the City Centre of Bath in the enterprise zone, the linkages between Odd Down and these sites are not good, as shown by the section below. Building at a slightly higher density in the enterprise zone, as this could be car free development with good walking linkages to places of employment, means that this would be a more sustainable location than Odd Down. The overall character of Bath is the high density of Georgian building in the city centre that has meant that Bath is a compact city that is easily walkable. Bath has a very high proportion of people that walk to work at 27% from the latest census data, this development will be principally car based travel which is against the stated aims of NPPF in advocating developing sustainable developments.

##### 3.5.Considering the other tests in paragraph 116

◦There are alternatives around, such as increasing the density of housing in other areas. See later paragraph 7

◦The documentation does not indicate how any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. For example: The area has a number of paths that are used by walkers to navigate the plateau linking to the beautiful villages of Combe Hay and Southstoke, these have not been taken into account.

#### 4.Transport

4.1.With MOD Foxhill, 800 houses on an adjoining road, being built, and housing at Radstock and Peasedown, towns

further out from Bath along the A367. The Wellsway (A367) will be busier. This also the key road linking the proposed development at Odd Down to Bath City Centre. The application for a new Sainsbury's Store on one of the adjoining roads in 2009, showed that the Red Lion Roundabout was at capacity, the ARCADY level at the junction is 0.836, from the planning papers June 2009. The Red Lion roundabout is a key roundabout on the A367 linking roads that then can lead on to Bristol and short cuts to A36 leading to Frome and beyond. As there is identified money for new roads in the future council budgets, this development and other local developments will make things worse potentially making this roundabout fail.

4.2.The council states that Bath City will be the economic driver for the authority, the A367 is the key road linking Radstock/Mid-Somer Norton to Bath, with more housing expected in this area as well the hold ups at the Red Lion junction will only get worse. The Council has recognised the problem by introducing further bus lanes along this stretch of road to keep buses on timetable. These small actions are unlikely to have an effect considering the amount of traffic generated by over 3000 potential houses.

4.3.If the plans are passed they show it would be possible to get through the land from the Odd Down Park and Ride to Southstoke Lane, a clear rat run. This is creating problems at the beginning and should be removed.

#### 5.Ecology

5.1.The areas has a number of bat feeding areas, bats being protected by UK law. The original bat surveys for this area were carried out before the works at the Combe Down stone mines were complete. The stone mines being a major roosting area for the bats, major disruption would have been created during the development. The number of trees present in the area create a natural foraging area for bats, the development proposed would be a major disruption and lead to lose of of habitat.

#### 6.Wansdyke

6.1.The council rightfully identifies the Wansdyke as important scheduled monument, one that is contained on English Heritages at risk register at this point. The council's own recent works at the Three Ways school damaged the monument. This is just one of many breaches along the length of the monument.

6.2.As the Wansdyke runs along the length of Sulis Meadows it has not been possible to easily link the communities. There are two linkages, one having planning permission and a second illegal breach of the Wansdyke. The third breach proposed by the council's plans makes it difficult to see how the monument is being protected. The council has failed over many years to produce a management plan on how the monument is to be preserved, nothing that has been rectified with these proposals. Any further building must mean that further damage will occur.

#### 7.An Alternative

7.1.There is an alternative. If the density of housing was increased by 10% in Bath there would be no need for the housing around Odd Down or Weston. This density would be considerably lower than the Oldfield Park area, and roughly the same as Sulis Meadows. We need housing in this area and don't disagree with the figure of 12,700, but we need to make best use of the land we have, to build on the Green fields in the next two years as the council is proposing before areas such as Foxhill and Bath West Riverside are developed seems wrong to us.

7.2. Recently the council has been considering 13/03835/FUL "Proposed Development Site King George's Road Twerton Bath", at its development control meeting in December 2013. The report states "This part of Bath is characterised by two storey terraced development, of varying age, at a density of approximately 50 dwellings per hectare. The proposal is for a modern interpretation of similar development, providing further 2 storey terraces at a density of approximately 51 dwellings per hectare. " For the council to say that developers will only consider developing at 35 houses per hectare seems to be wrong as evidenced by this recent application and previous applications and developments.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 4509 **Comment** 1 **Respondent** Mrs M van Aken  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

1. They are ruining this area of AONB.
2. Spoils village nature of South Stoke
3. Increasing traffic will result in very busy roads and traffic bottlenecks.
4. South Stoke will just become a suburb of Bath and lose its village appeal
5. Increased risk of destruction of Wansdyke (ancient monument)

**Change to the policy requested:**

Whole area should remain part of greenbelt and remain classified as part of AONB

**Respondent** 4511 **Comment** 4 **Respondent**  
**Number:** **Number:** **Name:****Respondent** South of Bath Alliance  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

I strongly object to the proposals to release Green Belt land around Bath for development GREEN BELT/AONB: (ref NPFF Clause 79 to 88.). I believe the land, which is also designated Cotswold AOB and includes the Wansdyke Scheduled Ancient Monument should remain undeveloped for the benefit of future generations and the enjoyment of current residents in Bath. It's also essential that the plateau should remain as a buffer between the city of Bath and the quintessentially English village of South Stoke. Building on the plateau would effectively join South Stoke to Bath in an urban sprawl. South Stoke village was designated as a Conservation Area in 1981. In 1958 the acclaimed art and architectural historian, Sir Nikolaus Pevsner, observed that South Stoke presented: "the happy sight of a village still entirely unurbanised, though only two miles from the main station of a city". South Stoke village also features on English Heritage's 2013 "At Risk Register"

I believe that Bath and North East Somerset Council can achieve its housing needs without releasing Green Belt land GREEN BELT/AONB: (ref NPFF Clause 79 to 88.) by increasing the density of housing on the three MoD sites at Lansdown, Warminster Road and nearby Foxhill, plus other brownfield developments. It's also believe that the housing need projection (15 years ahead) is open to question. Who knows what will happen in 15 years' time, how many jobs will be available in Bath or whether other buildings/spaces will have been released nearer the city centre such as the police station and disused office buildings? The principle of brownfield first should be strictly adhered to. (see BANES ref CSA22 and their Green Belt diagram CSA23 Annex 1 page 570)

As a resident of Southstoke Road, it's clear that the addition of 300+ houses on South Stoke plateau would completely change our road from a rat run joining Midford Road and Bradford Road/Entry Hill, into a main artery into the city from the south. BANES ref CSA 22/7 p21. There are already long queues north up to Bradford Road in the morning rush hour, while the Bradford Road/Claverton Down Road is heavily congested from the Tesco carriage right down to towards Brassknocker Hill in the morning and afternoon rush hours. The Bradford Road and Claverton Down Road cannot be widened so are effectively bottlenecks. Imagine adding the 800+ houses at the Foxhill MoD site along Bradford Road into the equation? That's potentially an extra 1,100 feeding onto the Bradford Road! Then there's the infrastructure of

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

schools, doctors etc...

I also think there's a real threat to Bath's unique status as the only city in the UK with UNESCO World Heritage Site status. Bath isn't just special because of its historic centre - it's setting makes it unique. Lose the green belt and Bath becomes yet another sprawling city.

In March 2013 Eric Pickles told the Telegraph: Firstly, our reforms safeguard our glorious green spaces and countryside. They protect the Green Belt - that vital green lung that prevents urban sprawl. And they defend Areas of Outstanding Natural Beauty, and other important environmental designations. Nothing will change that today. Nothing will change that tomorrow."

South Stoke Plateau is also important ecologically. CSA22/5 p18. Not only is the area used as a foraging area for an endangered species (the Greater Horseshoe Bat), but the skylark, also endangered, uses the fields as a breeding ground. Housing on the plateau would also jeopardise the delicate ecology and natural spring water routes that flow through the nearby Horsecombe Valley

Finally, the Wansdyke Scheduled Ancient Monument runs along the northern edge of South Stoke Plateau.CSA 22/6p19 ref NPFF Clause 132. This is of national and international importance, yet scandalously undervalued in Bath.

**Change to the policy requested:**

**Respondent Number:** 4511 **Comment Number:** 2 **Respondent Name:** Gareth Herincx

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

Before I I strongly object to the proposals to release Green Belt land around Bath for development GREEN BELT/AONB: (ref NPFF Clause 79 to 88.). I believe the land, which is also designated Cotswold AOB and includes the Wansdyke Scheduled Ancient Monument should remain undeveloped for the benefit of future generations and the enjoyment of current residents in Bath. It's also essential that the plateau should remain as a buffer between the city of Bath and the quintessentially English village of South Stoke. Building on the plateau would effectively join South Stoke to Bath in an urban sprawl. outh Stoke village was designated as a Conservation Area in 1981. In 1958 the acclaimed art and architectural historian, Sir Nikolaus Pevsner, observed that South Stoke presented: "the happy sight of a village still entirely unurbanised, though only two miles from the main station of a city".

South Stoke village also features on English Heritage's 2013 "At Risk Register"

I believe that Bath and North East Somerset Council can achieve its housing needs without releasing Green Belt land (ref NPFF Clause 79 to 88.) by increasing the density of housing on the three MoD sites at Lansdown, Warminster Road and nearby Foxhill, plus other brownfield developments. It's also believe that the housing need projection (15 years ahead) is open to question. Who knows what will happen in 15 years' time, how many jobs will be available in Bath or whether other buildings/spaces will have been released nearer the city centre such as the police station and disused office buildings? The principle of brownfield first should be strictly adhered to. (see BANES ref CSA22 and their Green Belt diagram CSA23 Annex 1 page 570)

As a resident of Southstoke Road, it's clear that the addition of 300+ houses on South Stoke plateau would completely change our road from a rat run joining Midford Road and Bradford Road/Entry Hill, into a main artery into the city from the south. BANES ref CSA 22/7 p21.

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

There are already long queues north up to Bradford Road in the morning rush hour, while the Bradford Road/Claverton Down Road is heavily congested from the Tesco carriage right down to towards Brassknocker Hill in the morning and afternoon rush hours. The Bradford Road and Claverton Down Road cannot be widened so are effectively bottlenecks. Imagine adding the 800+ houses at the Foxhill MoD site along Bradford Road into the equation? That's potentially an extra 1,100 feeding onto the Bradford Road! Then there's the infrastructure of schools, doctors etc...

I also think there's a real threat to Bath's unique status as the only city in the UK with UNESCO World Heritage Site status. Bath isn't just special because of its historic centre - it's setting makes it unique. Lose the green belt and Bath becomes yet another sprawling city.

In March 2013 Eric Pickles told the Telegraph: Firstly, our reforms safeguard our glorious green spaces and countryside. They protect the Green Belt - that vital green lung that prevents urban sprawl. And they defend Areas of Outstanding Natural Beauty, and other important environmental designations. Nothing will change that today. Nothing will change that tomorrow."

South Stoke Plateau is also important ecologically. CSA22/5 p18. Not only is the area used as a foraging area for an endangered species (the Greater Horseshoe Bat), but the skylark, also endangered, uses the fields as a breeding ground. Housing on the plateau would also jeopardise the delicate ecology and natural spring water routes that flow through the nearby Horsecombe Valley

Finally, the Wansdyke Scheduled Ancient Monument runs along the northern edge of South Stoke Plateau.CSA 22/6p19 ref NPFF Clause 132. This is of national and international importance, yet scandalously undervalued in Bath.

**Change to the policy requested:**

**Respondent Number:** 4512 **Comment Number:** 1 **Respondent Name:** Ian Dale-Staples

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

I consider the Core Strategy proposals to be unsound. I trust that B&NES will take into consideration the following points:

1. There are no adequate 'exceptional circumstances' identified for B&NES to ignore and over-rule current National Planning Policy Frameworks and local planning policies.
2. The South Stoke Plateau is Green Belt and an Area of Outstanding Natural Beauty and should remain substantially unspoiled.
3. The unspoilt Plateau provides the Buffer Zone required for Bath to retain its World Heritage City status.
4. The local road system and local infrastructure are barely coping with the present residents' needs and access and through traffic.
5. Documents CSA/7, CSA/10, CSA/17, CSA/20, CSA/21, CSA/22 & CSA/23, NPFF Clauses 79 to 88 & 132, and B&NES Policy B3a all refer.

There would not be the need to encroach upon Green Belt and AONB if the housing density of planned housing on brown field sites and elsewhere were increased to existing housing density levels.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:****Respondent Number:** 4518**Comment Number:** 1**Respondent Name:** Mrs Margaret Parsons**Respondent Organisation:****Agent ID:**      **Agent Name:****Further Information available in the original comment?**       **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

TREF NPPF Clause 79 – 88 Building in a Green Belt area, especially one that is also an AONB with a scheduled ancient monument in it, contravenes the latest government planning policy and thus cannot be allowed.

CSA 22/6 Pg 19 and ref NPPF Clause 132 The proposed development comes within metres of the conservation area of South Stoke Village with a potential access road running right along the boundary of the conservation area . This access road runs from South Stoke lane a peaceful rural lane with mainly single track traffic. Surely this cannot be sound policy. The area could not cope with the traffic that would ensue if building were allowed to go ahead.

CSA 22/5 pg 18. This is the foraging ground for a rare species of bat. The bat corridor of trees proposed by BANES would be useless. The building work necessary for the erection of 300 houses would drive all the wild life that enjoy this area away and no bat would come near the light pollution from 300 houses. It would have a knock on effect on all the surrounding rural area. This urbanisation would destroy all the lovely rural area of the green belt between the heritage city of Bath and the village of South Stoke. Local opinion on the danger of this seems to be being totally disregarded. He

**Change to the policy requested:**

I request that BANES policy to build on this South Stoke site should be dropped and the Core Strategy amended accordingly. I hope the inspector will visit the village of South Stoke to see how it will be affected . BANES try to pretend that the majority of this site is already in the urban area of Odd Down and do not mention South Stoke if they can help it, while almost the entire site comes within the rural parish of South Stoke.

**Respondent Number:** 4521**Comment Number:** 2**Respondent Name:** Sheila Neill**Respondent Organisation:****Agent ID:**      **Agent Name:****Further Information available in the original comment?**       **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

The plan is unsound because B&NES cannot move AONB boundaries (established in 1987) except for “wholly exceptional circumstances”. These are not proven. [NPPF 79-88].

B&NES states that the World Heritage Site of Bath does not need a buffer zone because it is protected by the Green Belt and AONB. Yet it is proposing to build within this protective zone by pushing back the Green Belt boundary.

The proposed changed Green Belt boundary leaves building within 120m of the South Stoke Conservation Area which will lead to the coalescence of the village with the urban sprawl of Bath.

This is an area of high risk as regards heritage assets. Total assessment is needed as interesting investigations are planned

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

by Bath University next year. Furthermore protection of the Wansdyke as proposed by B&NES in their latest amendment is not sufficient. [CSA22/6, NPPF 132]

There are approximately 370 houses on the Sulis Meadows estate. Yet the land proposed for development would hold about 700 at the same density. We are told that 300 more houses are needed here so why is so much land designated for building. [CSA22, CSA23]

Neither South Stoke Lane nor the single track lane along Brantwood's northern boundary could cope with increased traffic. Widening of these lanes and more lighting would mean creeping urbanisation and destruction of the rural setting. [CSA22/7]

Any further development for employment purposes around Manor Farm would seriously damage Green Belt, AONB, WHS and South Stoke Millennium Viewpoint. [CSA22/6]

The endangered species of great and lesser horseshoe bats and also skylarks are not going to remain due to the increased noise, pollution and artificial light engendered by development. South Stoke has 3 low energy streetlights thus preserving dark night skies and conserving energy. The development proposed by B&NES would greatly increase light pollution to the detriment of the environment. [CSA22/5]

### Change to the policy requested:

The entire strategic site allocation at land adjoining Odd Down should be removed from the plan.

Building on the Green Belt and in the AONB here would cause great damage. The housing targets should be reduced to make building at this location unnecessary.

**Respondent Number:** 4524 **Comment Number:** 1 **Respondent Name:** Mo & Gerald Rich

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

### Comment made on the Proposed Change:

Support:

We are writing on behalf of the "Neighbourhood Watch" members in cardinal Close.

1. It is not necessary to build on Green Belt Land, if the building density was raised on the other 4 sites very slightly. The land referred to as "Green Belt" is also agricultural land producing "FOOD" it has all been ploughed ready to plant. We cannot and should not loose 5 fields to the builders when it could be built else where. If every council was to loose 5 field of FOOD productive land (it would feed a lot of people) it would amount to a loss of a lot of food which we cannot afford. There is no other land in our area suitable for arrible farming.
2. The buildings refered to as job potential in the Core Strategy at Manor Farm will produce perhaps 20 or 30 jobs where are the other 6,000 plus coming from. Bath has no industry only shops and we don't need any more.
3. The loss of trees on the Sulis Manor area. The local farmers have been paid by the government to plant trees all through the Newton St Low valley. Also on the back of Sulis Manor estate these trees will not mature for 30 to 40 years and the plans are to cut down 60 to 70 mature trees around Sulis Manor. This area of trees is home to a lot of wildlife and forriging area vital to the survival of the Bats, which are rare, in the area close by. This should not be allowed to happen. The house itself I believe is wanted to develop into a retirement home.
4. We are on the wrong side of Bath for access to the M-4 motorway, it takes ½ an hour just to cross Bath and another 25 mins to the Motorway. I mention this because when 700 houses are built at Foxhill, if 300 are built here we will have 1000 cars all joining the same piece of road 'looking for work'. As mentioned in the Core Strategy no improvements to the road except for a roundabout.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

If as proposed a new entrance to the new estate is made in Coomhay Lane and another entrance or exit into Southstoke Lane we are then a "RATRUN". Traffic from Radstock will see us as a short cut to Bath and Midford Road via Entry Hill. Also traffic from the Foxhill area will travel in the opposite direction. You will definitely kill our "Escape to the Country".

5. We have 3 sites in Bath being vacated by the Admiralty. Surely they would meet all the housing needs for the future with also the site at Weston, the right side of Bath for travel to the M-4.

While the RiverSide development goes ahead these sites could be leveled and made ready for building on them. The admiralty site at Lansdown particularly is ideal for the M-4 and Bristol it also has a Park & Ride but no land that is arriable only pasture. Development here would be below the Bath skyline perhaps a piece of Green Belt could be pinched in that area.

6. The increased traffic on such a large scale in the area of ST Gregories College cannot be a good thing, it is very buisy now 13 coaches plus parents from 8AM and back from 2.30P.M.

The traffic at the moment morning and evening queuing from beyond Sainsburys at Odd Down all the way to Keynsham By Pass and back again on the other side. Also you have the traffic leaving Bath and going to Bath in the opposite direction crossing by the Red Lion roundabout no one does more than 5 miles an hour in any direction from 4 PM to 6.30 PM and the same in the morning from 8.AM.

I hope the Inspector gets to read why we do not want any Building on the Green Belt, FOOD producing Land.

**Change to the policy requested:**

**Respondent Number:** 4531 **Comment Number:** 1 **Respondent Name:** Susan Phillips

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

World Heritage Site buffer zone.

The Green Belt buffer zone protects a world Heritage Site, reducing the zone will reduce the protection.

Site access will create a "ratrun" between South Stoke village and the A367.

Wildlife will be endangered

Dark skies will not be possible.

**Change to the policy requested:**

Whole area should remain part of greenbelt and remain classified as part of AONB

**Respondent Number:** 4534 **Comment Number:** 1 **Respondent Name:** Stuart Cochran

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Weston (General)**Comment made on the Proposed Change:**Support: 

The proposed removal of land from the Green Belt and Cotswold AONB is not justified in the sense that the proposed scope is too wide. The land required for allocation to development could be provided without removing the land around the Wansdyke, the World Heritage Setting, and the South Stoke Conservation Area. If the intention, as shown in the Concept Map, is to “avoid harm to the WHS” and “avoid substantial harm to the SAM” then retaining that land in the Green Belt is the only justified option. In addition, the proposed potential access road from South Stoke Lane is also not justified since it would harm the World Heritage Setting in the same way. The proposed amendment is unsound due to the unjustified removal of land from the Green Belt in these two areas.

**Change to the policy requested:****Respondent Number:** 4535 **Comment Number:** 1 **Respondent Name:** Diana Cochran**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

The proposal is unsound because it does not justify the amount and scope of land to be removed from the Green Belt. In particular, the potential access road in South Stoke Lane is referred to in CSA22 as affecting the Cross Keys junction but is shown in the Concept Map as being much closer to the boundary with Brantwood. This would negatively impact the World Heritage Setting.

**Change to the policy requested:****Respondent Number:** 4538 **Comment Number:** 8 **Respondent Name:** Ned Garnett**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

Placemaking Principle 5

The proposed development adjoining Odd Down will destroy a habitat that is home to many species including a foraging area of Greater Horseshoe bats and nesting site for Skylarks.

Bats

The area lies within the foraging area for the Greater Horseshoe Bat. The Bath and Bradford on Avon Special Area of Conservation has 15% of the UK population of Greater Horseshoe bats and also populations of Bechstein’s Bat. Both species are protected by a wide range of legislation including the Conservation of Habitats and Species Act 2012 and the Wild Mammals Protection Act.

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

English Nature's paper on the protection of the Greater Horseshoe bat states that: Although the protection of important roosts and hibernation sites is important, the effective conservation of the greater horseshoe bat depends on the management of the farmed landscape around maternity roosts and other sites used by the bats.

The foraging range of Greater Horseshoe bat is typically 4km from the roosting site. The closest roosting site to South Stoke is Combe Down Mines and the site proposed area for development is within 4km of there. Building on the site at Odd Down will adversely affect the population of these protected species.

### Skylarks

Placemaking principle 5 states that the development must 'Safeguard skylark interest'. This cannot be achieved.

The plateau land to the east of Sulis Manor is a nesting site for skylarks. The plateau land is ideal nesting habitat for skylarks and a habitat not found elsewhere within this area. Skylarks require open relatively undisturbed arable or moorland to breed. It is not possible to build on this site and safeguard the skylark interest.

The Royal Society for the Protection of Birds classifies Skylarks as being 'Red' status. Red is the highest conservation priority, with species needing urgent action. Skylark populations are declining in almost all countries of northern and western Europe. In the UK, the population halved during the 1990s, and is still declining. In the preferred habitat of farmland, skylarks declined by 75% between 1972 and 1996 (<http://www.rspb.org.uk/wildlife/birdguide/name/s/skylark/threats.aspx>).

### Placemaking principle 6

The proposed development of the South Stoke plateau will damage a scheduled ancient monument.

The Wansdyke is a scheduled ancient monument that runs along the northern boundary of the proposed site. It is a 5th century territorial boundary that is still a significant landscape feature and is amongst the longest earthworks of its period in England.

As the report from Arup commissioned by the Council points out, the previous development at Sulis Meadows 'has placed considerable pressure on the Wansdyke, and led to serious erosion of the monument.' It goes on to say that 'there are serious concerns that development in this area will lead to similar damage and erosion of the monument. Furthermore, it may prove equally difficult to protect the setting and the rural character of the Southstoke conservation area.'

The 'Heritage Asset Assessment – Sulisdown Land at Odd Down, Bath' undertaken by CGMS Consulting on behalf of BANES (CD9/LV/1), assessed the impact of building on the Odd Down site on the Heritage assets. This found the majority of the area to be high risk, the remainder to be medium risk with only the Odd Down football field to be low risk.

The report states: As outlined in the NPPF and Table 2.2 of this report, development in areas of high risk should be exceptional or wholly exception and therefore avoided as there is a risk that development could cause substantial harm to the designated heritage assets, or non-designated heritage assets of demonstrably equivalent significance, and/or their settings.

The development of the site at Odd Down therefore cannot be achieved without causing significant damage to an ancient monument and other heritage assets. It should therefore be rejected.

### Change to the policy requested:

The development within the green belt at Odd Down should be removed from the Core Strategy Amendments.

**Respondent Number:** 4538 **Comment Number:** 7 **Respondent Name:** Ned Garnett

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

The plan shows a proposed access point to the Odd Down site from Southstoke Lane. Southstoke Lane is very narrow, with a pavement and mature hedgerow on one side and private houses on the other and therefore could not be widened. Currently it is not safe for two cars to pass on Southstoke Lane without one of the two cars stopping and in the cases of larger cars driving on to the pavement. This is therefore a completely unsuitable and dangerous access point to any new development.

I understand that the Hignett Trust are still pushing for a roundabout and access to the site from the Cross Keys. This is totally unacceptable and require building a road on land that is to remain within the green belt and would be used as future justification for the development on this area of green belt.

**Change to the policy requested:**

The development within the green belt at Odd Down should be removed from the Core Strategy Amendments. If there is any development there must not be access to it from Southstoke Lane of the Cross Keys roundabout.

**Respondent Number:** 4538 **Comment Number:** 4 **Respondent Name:** Ned Garnett**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

The development of houses in the Green belt at Odd Down is in the Cotswold Area of Outstanding Natural Beauty (AONB) and in the setting of a World Heritage city and cannot be justified.

AONBs are designated by the Countryside and Rights of Way Act 2000. The building of 300 houses within this area of the AONB will effectively change the boundary of the AONB. This requires Natural England to put forward a variation order to the Secretary of State, which has not happened.

The National Planning Policy Framework (para 116) states that: Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. No such exceptional circumstances exist and the narrowing of the green belt, the damage that will result to a scheduled ancient monument and the destruction of habitat for protected species are not in the public interest.

Bath is the only World Heritage City in the UK. As the BANES website states 'The landscape of Bath and its surroundings contribute significantly to the special character of the World Heritage Site, and is a key aspect of Bath's Outstanding Universal Value.' Development in the proposed site will encroach in to the surrounding countryside and coalesce with the outlying villages. The green buffer zone around Bath is a key criterion in its status as a World Heritage City and therefore must be protected.

Photographs from the South Stoke plateau land are included as a separate attachment to demonstrate the landscape value of this site.

**Change to the policy requested:**

The development within the green belt at Odd Down should be removed from the Core Strategy Amendments.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

**Respondent Number:** 4542 **Comment Number:** 1 **Respondent Name:** Mrs Rachel Foster

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

I'm objecting to the releasing of the land on the South Stoke plateau from Green Belt.

This land has been allocated as a 'Cotswold Area of Outstanding Natural Beauty' for a reason. It is stunning countryside.

If you ignore the reasons why this land was allocated this title and remove the protection to build houses, then it means that other "protected" areas are meaningless. What will be next? One day they will be building houses on National Parks – the Lake District? Exmoor? etc etc....

You are setting a precedent for the rest of the country.

PLEASE DO NOT REMOVE THE PROTECTION ON GREEN BELT LAND. Build somewhere else.

**Change to the policy requested:**

The policy needs to re-emphasise and strengthen the protection afforded to Green Belt Land.

**Respondent Number:** 4547 **Comment Number:** 1 **Respondent Name:** Mr MGS Davis

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

GREEN BELT/ ANOB

'Exceptional circumstances' to abolish Green Belt/ ANOB land have NOT been proven. No attempt even seems to have been made to do so. . It is hard therefore not to conclude that this perfect building land is in the process of being illegally and sacrificially handed to Builders to boost their margins and encourage their participation in developing Brown Field sites which they, the Builders, are not compelled so to do.

WORLD HERITAGE SITE

A buffer zone is required by UNESCO for Bath to retain WHS status. The council is proposing to deliberately remove this buffer zone to the south of the City by abolishing Green Belt/ ANOB land. The possible consequences in losing WHS status as a result should be clearly understood.

HERITAGE ASSETS

The proposed development lies within probably the most sensitive area of land surrounding Bath, the Wansdyke Scheduled Monument immediately to the North and the ancient Saxon village of Southstoke, immediately to the South, a Conservation Area in its own right. In this context the proposed plan seems to be senseless and irresponsible by those who will ultimately be held to account.

DEVELOPMENT PLAN

No person should be fooled by the stated number of houses to be built according to this strategy. The proposed amount

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of land to be removed from the Green Belt/ ANOB would accommodate more than 1000 dwellings.

**Change to the policy requested:**

NO EXCEPTIONAL CIRCUMSTANCES HAVE BEEN PROVEN TO ALLOW THE REMOVAL OF GREEN BELT/ANOB LAND ON SOUTHSTOKE/ ODD DOWN PLATEAU. THE CORE STRATEGY IS THEREFORE FLAWED AND THIS PART OF THE PROPOSED STRATEGY SHOULD BE IMMEDIATELY ABANDONED

**Respondent Number:** 4552 **Comment Number:** 1 **Respondent Name:** Mark and Joy Lacey

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

There can be no justification for building on this AONB nor for the huge disruption that it would bring to a now well-established community. The additional noise, traffic and pollution from this proposed development would be a real blight on the living circumstances and conditions for the many families and others who have chosen to make Sulis Meadows their home. We have been supportive of some developments in the area, including the creation of a new supermarket and the sixth form centre at St Gregory's but this latest proposal is nothing but destructive to what a visitor to our home once called 'one of the most beautiful parts of the world - I would rather be here than anywhere' - having just taken a walk down to the Southstoke viewpoint. We were promised when the previous government went out of power that this would no longer be proposed but again it appears that our national and local politicians are letting us down. Only our own local councillors seem to have the courage to stand up for our community. There are so many other options – brown field options and derelict sites along the Lower Bristol Road for example - that could be redeveloped to transform eyesores rather than destroying such wonderful countryside.

It has been my pleasure to be resident in Bath for the past 21 years. It has been impressive to see the achievements of the local council in very many ways, including the stylish new Spa and the highly impressive new Southgate development. Our children are being educated to a very satisfactory standard in our local schools and the range of services provided by the Council are generally to a very high standard.

In the context of the above, we are therefore completely bemused to hear of the potential resurrection of the option to build 300 or more new houses on the Odd Down/South Stoke plateau. So many of the above developments have been undertaken so tastefully and impressively, blending in with the heritage status of the city. The prospect of what is currently designated as an Area of Outstanding Natural Beauty is beyond our comprehension and defies all sense of reason and responsibility.

We cannot understate the beauty of the natural environment in this area that is situated directly next to our house. Being able to bring our family up in such close proximity to such an area is something that we value highly and we will do anything we can to protest our objections to this proposal in as constructive and reasonable a way as possible. We have a friend who has visited us on occasions from Germany and she states that the countryside she is able to view from the plateau is one of 'the most beautiful places on earth'! Any decision to destroy this with housing would be wrong and highly irresponsible.

Not only does the proposal concern us in principle but we also find the extent of these proposals concerning. The impact that this number of houses will have on the whole demographics of the area will be nothing short of catastrophic. The levels of light, noise and other pollution will be significant. The social implications of squeezing so many dwellings into such an area will be very significant and would completely change the socio-economic demographic of the area. The existing area of Sulis Meadows is tastefully and spaciouly developed. The thought of so many more houses at such a density sounds like a recipe for disaster in so many ways.

It is also clear that the infrastructure of the area is inadequate to deal with such a development in addition to the plans for the old MOD site at Foxhill, and that even suggested improvements would simply produce multiple impact on the

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environment and simply serve to create further bottlenecks in the transport network. To hear of the potential demolition of Sulis Manor would surely also be a tragedy. The construction of this development and accompanying roads would have a devastating effect on the environment and quality of life for so many residents who enjoy the far-reaching views and existing climate that is on offer. In addition to the transport infrastructure, it also has to be appreciated that sewage and other services are inadequate to meet the needs of such a new community. The impact on the village of Southstoke will also be huge and whilst we do not live there, we would be very disappointed to see such a village lose its identity to such a degree.

This would also bring a significant change to the use of land in this immediate area and again bring significant environmental impact. For an Area of Outstanding Natural Beauty and Green Belt to be affected so significantly should not be allowed to happen and we strongly urge the Council and Planning Inspectorate to turn its attention away from this stunning area and to pursue alternative options in more detail. The fact that the landowner is willing to sell this land should not be reason enough to proceed with this plan. We understand that this land was discounted some time ago as an option – the economic desires of a local farmer should not be sufficient to sway a far-reaching decisions that will have such a drastic effect on so much natural beauty and so many people. That would be a short-term gain for long-term pain as far as the environment is concerned.

We understand that proper and sufficient impact assessments have not been carried out. This appears to be a rushed job in order to help hit a targets for new housing. There are too many things at stake for this to be done.

We will be happy to express our concern with any who wish to discuss them with us further. As indicated at the outset, we have thus far had a lot of faith in the work of Bath and North East Somerset Council and we hope that a sensible and reasoned decision will be made in this respect. My young children are incredibly upset to think that their environment will be so seriously affected. For their sakes, and the sake of the local natural habitat, we appeal to you to see reason in this matter.

**Change to the policy requested:**

The policy needs to re-emphasise and strengthen the protection afforded to Green Belt Land.

**Respondent Number:** 4561 **Comment Number:** 1 **Respondent Name:** Juliet Coles

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

I am writing regarding the B&NES core strategy amendments.

The site is within the Green Belt, is an AONB and a World Heritage Site. The National Planning Policy Framework makes it clear that this cannot be built upon except in 'exceptional circumstances'.

(Ref: CSA/7, CSA/10, CSA/17, CSA/20, CSA/21, CSA22, CSA/23. B&NES Policy B3a and NPPF Clauses 79 to 88)

There has been no case put forward which outline these exceptional circumstances.

UNESCO require a Buffer Zone for Bath and yet B&NES have not provided one because they have always claimed that the city is protected by the AONB and Green Belt. If the AONB and Green Belt can be changed so easily, then where is the required Buffer Zone?

The proposed potential access road along Brantwood's northern boundary to South Stoke lane is only a single track road. Any access from this easterly direction would mean pavements, new roads and street lighting, thus encouraging future development across all of the plateau in the future as well as causing immediate significant impact to the village of South Stoke. In view of the council's own requirements of a significant buffer between any developments and the village, this is

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unsound.

(Ref: CSA22/7)

The Wansdyke is of undisputed historical value, and the village of South Stoke is an important Cotswold village. Any area of the proposed site that may have an impact on either of these should remain in the Green Belt. If the Southern boundary of the site isn't going to be developed, then it too should stay in the Green Belt.

(Ref: CSA22/6 and ref NPFF Clause 132)

Why is so much land being taken out of the Green Belt for 300 houses? The proposed site is enough for up to 700 houses (in line with existing housing at Sulis Meadows). This suggests future development.

(Ref: CSA22 and Green Belt diagram CSA23. Annex 1 page 57)

The plateau is noted as being a breeding ground for skylarks and an important foraging area for rare species of bats. Leaving a tree belt and hedgerows will not mitigate the disastrous consequences brought about by development of their natural habitat. This is not a sound proposal.

**Change to the policy requested:**

To summarise, I am asking you to look again at the soundness of the BANES Core Strategy Amendments for the benefit of the Wansdyke, the wildlife, the village of South Stoke, and the people of Bath.

**Respondent Number:** 4568 **Comment Number:** 1 **Respondent Name:** Mrs A R Ashworth

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

We have spent the last year attending meetings, going on demonstrations, walking with placards across the Southstoke Plateau and writing innumerable letters to BANES Council, to Eric Pickles the Minister for Communities and Local Government, to Simon Jenkins of the National Trust, from all of whom we have received replies. We completed the BANES form in May 2013 and received a reply- our correspondence number being 4568. We have since then attended the latest Consultation meeting at St. Gregory's School in Odd Down, and are now aware of where the houses would be sited, if this plan to build on the Southstoke Plateau goes ahead.

We realise that you are aware of our concerns that this is precious Green Belt land, an area of Outstanding Natural Beauty, and the site of the Ancient Monument- the Wansdyke. The Green Belt land has already been violated in the building of Sulis Meadows and if this building goes ahead, the whole plateau will gradually be built upon, particularly if a road is built from Southstoke Lane to join up with the Sulis Meadows Estate. So much for the Green Belt that is supposed to surround our World Heritage City. So much for the barrier between the city and the beautiful villages nearby like Southstoke and Combe Hay. So much for the area much loved by local residents, not only in Midford Road but also in Sulis Meadows.

We cannot stress too strongly how much we oppose this building plan, not only for the above reasons but because of the vast increase in traffic which is bound to follow on. Have you ever driven along Bradford Road or Midford Road between 8.00 and 9. 00 am. or 4.00 and 6.00 pm.? The roads are already near saturation point and this traffic will increase with the 700 houses already planned just a very short distance away on the Foxhill Estate.

There is a South of Bath Alliance petition signed by over one thousand three hundred concerned people which is violently opposed to the plan. If democracy means anything these days, you should listen to them. We urge you not to go ahead with the building - there are other alternatives.

Change to the policy requested:

Respondent Number: 4569  
 Comment Number: 1  
 Respondent Name: J. Whaley  
 Agent ID:  
 Agent Name:

Respondent Organisation:

Further Information available in the original comment?  Attachments sent with the comment?

Change Reference: CSA22 Land adjoining Odd Down

Location: Land adjoining Odd Down

Comment made on the Proposed Change:

Support:

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-  
 -GREEN BELT/AONB : (ref NPFF Clause 79 to 88.)  
 (Insert reasons for objections in your own words)  
 Green belt land should be kept as Green Belt for peoples health. Why class anywhere as Green Belt if it can be changed at a whim?  
 We need the quiet Green Belt to relax in after the rigors of the noise of the city and work.

-DEVELOPMENT PLAN: (see BANES refCSA22 and their Green Belt diagram CSA23 Annex 1 page 570) (why is it necessary to remove so much land from the Green Belt)  
 (Insert reasons for objections in your own words)  
 Why take Green Belt land for houses when there are other places in Bath not classified as Green Belt that houses can be built? Why not have all the empty houses and empty office space changed into accommodation.

-SITE ACCESS AND TRANSPORT: BANES refCSA 2217 p21  
 (Insert reasons for objections in your own words)  
 To have more traffic in and around Sulis Meadows, in my opinion, would make it unsafe for residents already living here. Also, the roads around it are gridlocked enough as it is. To have even more traffic would be dreadful and unhealthy.

-WORLD HERITAGE SITE BUFFER ZONE (Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it. BANES have long said that the green belt protects it. Now it plans to remove this protection.)  
 (Insert reasons for objections in your own words)  
 Bath should be proud that it is the only World Heritage City in England, Where is the buffer zone going to be, to protect it, if the Green Belt (which at the moment protects it) is removed? It needs to be protected.

-HERITAGE ASSETS: CSA 22/6p19 ref NPFF Clause 132 (moving the boundary/ protecting the Wansdyke, a national monument that runs through from St Gregory's school to the Cross Keys Pub)  
 (Insert reasons for objections in your own words)  
 I find it hard to understand how the Wansdyke and South Stoke Conservation area is to be protected, unless this area remains in the Green Belt.

-ECOLOGY/WILDLIFE refCSA22/5 p18 (the area is used as a foraging area for an endangered species e.g. Horseshoe bat. They use the trees, but would be hindered by light and noise of any development. The skylark, also endangered, uses the area as a breeding ground. Dark skies are fundamental to retain the beauty of this landscape. Mitigation of these issues is not possible.)  
 (Insert reasons for objections in your own words)  
 Wildlife needs a quiet area to exist. Much of the wildlife would be destroyed if this area was urbanised. We need to look after the wildlife and make sure it all has somewhere to live too. Our lives would be worse off if the wildlife and birds were not here to be appreciated.

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**Agent ID:** **Agent Name:****Respondent Organisation:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

We consider that following items make the Core Strategy unsound:

## 1. Green Belt/ AONB -

Building in the Green Belt, AONB, setting of the World Heritage City of Bath and adjacent to the Wansdyke is wrong and contravenes the latest National Planning Policy Framework unless "exceptional circumstances" can be proved to exist, or in the case of Heritage assets (eg Scheduled Ancient Monuments) "wholly exceptional circumstances" (Ref NPFF Clause 79 to 88)

## 2. World Heritage Site Buffer Zone -

BANES have long argued that they do not need to define a buffer zone for the World Heritage City of Bath because its setting is protected by the Green Belt and the AONB. What is the point of these statutory protections if they can be so easily set aside? UNESCO require a buffer zone and BANES have failed to provide one.

## 3. Heritage Assets -

If the southern boundary should remain undeveloped, it should remain in the Green Belt. If the Wansdyke is to be protected from development, the area in front of it must remain in the Green Belt. If the South Stoke Conservation Area is to be protected against inappropriate development, any areas that on the concept diagram that might affect it should remain in the Green Belt ( see CSA22/6p19 and ref NPFF Clause 132)

## 4. Ecology/Wildlife -

The area is recognised as a foraging area for rare species of bat. Though they make great use of the tree belts, they would be obstructed by noise and light created by the new development. Much of the area is a long established breeding ground for skylarks. Pouring concrete over their nesting site will mean that this endangered (and well- loved) species will have lost yet another area of suitable land on which to breed. Dark skies are a fundamental feature of this precious landscape. This will be lost forever. Mitigation of these issues is not possible (see CSA 22/5 p18)

**Change to the policy requested:****Respondent Number:** 4574 **Comment Number:** 1 **Respondent Name:** Robert James  
**Agent ID:** **Agent Name:****Respondent Organisation:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

I do not support CSA 22. Could you please take into account my objections to the Council's proposed amendment CSA22

that Green Belt and AONB land adjoining Odd Down (as shown in BANES Concept Map CSA 23) should be allocated for housing in the Core Strategy document. I OBJECT on the following grounds:

#### GREEN BELT AND AONB

The land is in the Green Belt and in an Area of Outstanding Natural Beauty, two of the the highest levels of protection under planning regulations, and which therefore require the Council to have shown that there are interests of national importance which justify setting aside such high level designations. The Council has not shown that such interests exist, other than say that there is not sufficient land in city locations not included in the Bath Green Belt to fulfil its projections for housing need. This reason does not amount to an interest of national importance, because it overlooks the simple solution of increasing housing density of currently allocated sites such as Bath Western Riverside and the MOD sites, by a factor of 10 per cent. This density would be lower than the Oldfield Park area, and roughly the same as Sulis Meadows. On the question of density, paragraph 116 of the NPPF, giving guidance for AONB, states that "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances ... Consideration of such applications should include an assessment of: the cost of, and scope for, developing elsewhere outside the designated area, or of meeting the need for it in some other way." Thus the Government's guidance clearly offers a route by which the Council could avoid the conflict of proposing 300 houses in the AONB and Green Belt, if it were to simply consider increasing housing density on currently allocated sites by around 10 per cent.

CSA 22 contradicts paragraph 79 of the NPPF, because it would fail to "... prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence". In currently overlooking the possibility of increasing housing density on allocated sites by 10 per cent, thus avoiding the need to propose CSA 22, the Council also contradicts paragraph 80 of the NPPF, "... to assist in urban regeneration, by encouraging the recycling of derelict and other urban land". The NPPF makes it clear that Councils should make every effort to find alternatives to major development in designated areas such as AONB. By proposing to build on a greenfield site which is subject to the highest levels of planning protection (AONB and Green Belt) when it could meet its housing projections on more sustainable sites with existing development footprints (e.g. Western Riverside, MOD sites) the Council is acting contrary to its own Green Belt and sustainability policies, and thus CSA 22 is unsound.

#### TRANSPORT

Building 300 houses on the land indicated by Concept Map CSA 23 would cause significant extra strain on an already overloaded road system and would contradict sustainability outcomes because of the site's distance from city centre and Western Corridor services, where most of the employment opportunities would be provided. Wells Road/Wellsway (A367), Midford Road (B3110), Frome Road, Rush Hill, Bradford Road (A3062), and the A367 outwards from Odd Down, are all subject to long traffic delays at peak times, and often gridlock. Bus services to the city centre are sparse and subject to the same traffic-flow problems. Evidence presented during the application process for the Sainsbury supermarket in Frome Road showed that the Red Lion roundabout was at capacity. Adding another 300 houses with at least one car per household would exacerbate these chronic problems, representing a major contradiction to sustainability outcomes for this policy, and indicating its unsoundness.

#### WORLD HERITAGE SETTING

Bath's designation as a World Heritage Site was not dependent only on its architectural interest, but also on its setting within a ring of hills relatively unspoiled by unsympathetic development. This was one of the reasons why building along the A4 to The Globe roundabout was rejected, and similar reasons were given for disallowing housing near Newton St. Loe. The Council's own assessment shows that large parts of the land on the Odd Down plateau would have medium to high adverse effect on the World Heritage setting, while the Draft Core Strategy document makes specific mention of the importance of the surrounding countryside to the WHS setting. The Council's insertion of CSA 22 thus raises a conflict of policy within the Strategy document, and is therefore unsound.

#### ECOLOGY AND WILDLIFE

Use of the land at Odd Down for housing would result in the destruction of land currently used for crop production, and would therefore be a direct contradiction to the Council's sustainability policies elsewhere, and of NPPF guidance in paragraph 115, which in referring to AONB states: "The conservation of wildlife and cultural heritage are important considerations in all these areas..." Destruction of these fields would obliterate habitat used by foraging Greater Horseshoe Bats (counter to NPPF policies of habitat protection) and, through the artificial light and noise of a new development, would break up the traditional flightpath of the bats en route to the Englishcombe valley. The fields also sustain a population of Skylarks, a nationally endangered species, which delight local residents with their flightsong each

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spring and summer, a sound which would disappear with the destruction of these fields. As no mitigation can be provided for these two species, because their current habitats will be replaced by housing, the amendment thus contradicts Core Strategy nature conservation policies, indicating that it is unsound.

**SOUNDNESS OF CSA 22**

The Council's proposal to build 300 houses on AONB and Green Belt land, counter to its own land-use policies and NPPF guidance, when it has the alternative of achieving projected housing needs by the expedient of slightly increased density at already-allocated sites, signifies inadequate justification for the amendment. It is thus not effective, because it proposes development on land of the highest protection designation without sufficient justification, and is therefore inconsistent with national policy. For these reasons the amendment is unsound.

**Change to the policy requested:**

**Respondent Number:** 4578 **Comment Number:** 1 **Respondent Name:** James and Sue Graham-Brown **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

Re: BANES Core Strategy Amendments (Nov 2013) We write in response to the Amendments to the BANES Core Strategy (Nov2013) in respect of the proposal to develop the western area of South Stoke Plateau which has until recently been protected from development as part of the Green Belt and in a designated Area of Outstanding Natural Beauty. Moreover, the section of land that is to be released for housing is contiguous to one of the last remaining sections of the Wansdyke which is a monument of particular historical interest.

Given all the above categorisations it would be hard to conceive of a development that would be more harmful to the environment from both a historical and an aesthetic point of view. The part of the Wansdyke that has already been squeezed between developments in the Sulis Meadow area has not only been seriously eroded by inappropriate use but is also now a dumping ground for litter and dog mess. To contemplate extending development so that another section of the monument is similarly surrounded by housing will ensure the eventual destruction of this most significant of British landmarks.

As elected and appointed custodians of our national heritage we look to you to protect our environment and respect the heritage that we wish to pass on to future generations. Once it is gone, it is gone forever, and such decisions should not be made lightly or without the very strongest justification which hitherto has not been evident.

I am also deeply concerned that insufficient attention has been given in the Core Strategy to the protection of rare species for which the South Stoke Plateau is one of the few remaining breeding grounds. Both bats and lapwings are indigenous to the area and the impact of the proposed development on their ability to survive cannot be underestimated. Again, we look to you to recognise the dangers that your strategy pose to wildlife.

We accept the need for additional housing but the existing strategy is deeply flawed and short-sighted. Ten years ago Friends of The Earth predicted the decline of the High Street in Britain and argued that it was in the urban centres that councils should look for future developments. With increased competition from Internet Shopping the decline is bound to continue and accelerate. Given that FOE's projected figures suggest that by 2020 there will be in excess of 150,000 commercial buildings in Britain both available and suitable for conversion to domestic dwelling, any further destruction of our rural landscape is as unnecessary as it is astonishingly short-sighted.

**Change to the policy requested:**

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The green belt was set to preserve areas of green countryside and should only be set aside if there is nowhere else for development. At the moment there are brownfield sites which could be developed first.

CSA20 bath is a world heritage city, partly because of the green belt around and within the city. Bath is set in a rural landscape with distinct Cotswold villages such as Midford, Monkton Combe and Southstoke. The green belt clearly delineates the rural area from the city.

CSA21 does this not say that the green belt boundaries should not be altered

CSA22 this change will cause harm

This development in my opinion is unsound. It removes the protection for the villages so important not only to the world heritage setting of bath but also to the villages themselves.

**Change to the policy requested:**

Land should not be removed from the green belt to provide housing until all other opportunities are exhausted.

This land is in an area of outstanding natural beauty, contributes to the setting of the conservation area and the world heritage setting of the city of bath, and forms the site of a scheduled ancient monument, the wandsyke.

There are other areas which could be developed for affordable housing and the development of this land is entirely unjustified.

**Respondent Number:** 4584 **Comment Number:** 1 **Respondent Name:** J.A. Summers**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

The new line drawn to define the Green Belt gives me little consolation. It is still the case that acres of prime, productive, agricultural land will be allocated for development. It is obvious that the developers have plans to build far more market value houses than we are led to believe in order to make huge profits, which they are unable to make from building affordable homes. The harm done by covering our precious Green Belt with concrete far outweighs any benefits with excess light pollution and congestion from hundreds more cars as well as the destruction of wildlife in the area.

Bath still has plenty of undeveloped brown field sites and empty buildings. The ex-MOD sites, where services are already installed could provide the city with hundreds of new, affordable homes to meet government requirements. The Rt. Hon. Eric Pickles MP promised in his article published by the Daily Telegraph in March this year that no Green Belt land would be considered for development until every inch of brownfield sites had been used. He says 'I won't let the bulldozers wreck middle England'. He also tells us that power will be devolved downwards and that the views of 'the people' would be listened to. I'm afraid that in South Stoke we feel that our views are falling on deaf ears!

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I declare this amendment to be unsound.

**Change to the policy requested:**

**Respondent Number:** 4585 **Comment Number:** 1 **Respondent Name:** Dr C. W. Stammers

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke

-GREEN BELT/AONB: (ref NPPF Clause 79 to 88.)

There are other sites- the three ex-MOD sites for example. There is no need whatsoever to destroy this AONB and Green Belt, which provides a region of peace for people of South Bath

Even if other sites are (wrongly) dismissed, the area to be removed from the Green Belt cannot be justified for the number of houses

-SITE ACCESS AND TRANSPORT: BANES ref CSA 2217 p21

Access at Southstoke Lane will add serious loading on traffic flow along Midford Road, which is already heavily laden. Any through access will create a RAT RUN to avoid the highly congested Frome Road area (Red Lion Roundabout, Sainsburies, Glasshouse (Esso Garage) junction

-WORLD HERITAGE SITE BUFFER ZONE

Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it. BANES have long said that the green belt protects it. Now it plans to remove this protection.

-HERITAGE ASSETS: CSA 22/6p19 ref NPPF Clause 132

Moving the boundary, protecting the Wansdyke, a national monument that runs through from St Gregory's school to the Cross Keys Pub) is a damaging act

-ECOLOGY/WILDLIFE ref CSA22/5 p18

The area is used as a foraging area for an endangered species e.g. Horseshoe bat They use the trees, but would be hindered by light and noise of any development. The skylark, also endangered, uses the area as a breeding ground. Dark skies are fundamental to retain the beauty of this landscape. Mitigation of these issues is not possible.

**Change to the policy requested:**

**Respondent Number:** 4586 **Comment Number:** 1 **Respondent Name:** Mrs Anne Winpenny

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

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The amendment to the core strategy is unsound for the reasons I gave in my first comment form sent in May 2013. Namely:

There is no justification to build on Green Belt land.

There is no justification to build on land that is a named AONB

The NPPF state that this would be 'inappropriate' unless 'special circumstances exist'.

The South Stoke/Odd Down Plateau has its own special circumstances which must be taken into account. Namely: Development so close to South Stoke, a CONSERVATION VILLAGE, would destroy its unique rural character for ever. eg increase in traffic especially if site access into Southstoke Lane is allowed.

Development here would destroy the setting of Bath as a World Heritage site for ever.

Development here would destroy the setting of the Wansdyke, a Scheduled Ancient Monument, for ever.

Development here has not taken into account of the damage of a built environment with increased light, buildings and traffic that would affect the rare species of bats that use this land as a foraging area and nesting skylarks, for ever.

There is no justification that there is a need for the number of houses that BANES have suggested. The housing needs could be met by increasing density on Brownfield sites, investigating neighbouring councils who already have good transport links and use of land already belonging to BANES.

**Change to the policy requested:**

For the reasons given in 7, I consider the amendments to the core strategy to be unsound and that BANES have not taken into account the 'special circumstances' that this site has and that should be protected for ever.

**Respondent Number:** 4591 **Comment Number:** 2 **Respondent Name:** Dr Marie Weinel

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-

-GREEN BELT/AONB: (ref NPPF Clause 79 to 88.)

I object to the changes at the Odd Down / Southstoke site because Bath is a World Heritage City. For hundreds of years it has attracted visitors, drawn to its waters, buildings and beautiful setting in the Cotwolds AONB. Remove the green belt and you destroy the character of both the city and the surrounding villages. Once the green belt has been removed, the decision cannot be reversed. The council has a duty to protect the character and essence of Bath for future generations

-DEVELOPMENT PLAN: (see BANES refCSA22 and their Green Belt diagram CSA23 Annex 1 page 570) I object to the changes at the Odd Down / Southstoke site because all local authorities have a duty to use brown field sites, before encroaching on to the green belt. Why is it necessary to remove so much land from the Green Belt? Empty brown field sites are unsightly and using them up enhances a city, and saves using the green belt. Empty brown field sites should always be used first, because they make a city appear run down and attract vandalism and litter.

-SITE ACCESS AND TRANSPORT: BANES ref CSA 22/7 p21

I object to the changes at the Odd Down / Southstoke site because, even now at peak times access off the P&R Odd Down roundabout is difficult, as giving priority to traffic from the right on the Wells Road, there are few gaps to pull out safely. More traffic will increase the problem. The main carriageway into Bath A367, is currently over capacity at peak times, congestion is an everyday occurrence and will worsen with increased load. Sulis Manor Road is narrow, has parked

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

vehicles and traffic calming, to increase traffic volume would be highly dangerous. Increased traffic will pose a danger to school children, particularly from St Gregory's. The narrow lanes towards South Stoke and Combe Hay would have to be widened, changing the character of the area and destroying hedgerows.

**-WORLD HERITAGE SITE BUFFER ZONE**

Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it. BANES have long said that the green belt protects it. Now it plans to remove this protection. I object to the changes at the Odd Down / Southstoke site because it is unknown whether Bath will retain its unique status as a World Heritage City without its setting in an AONB. It has not been made clear how the spa waters are to be protected in the face of extensive building.

**-HERITAGE ASSETS: CSA 22/6pl9 ref NPFF Clause 132 (i.e. moving the boundary)'/ protecting the Wansdyke, a national monument that runs through from St Gregory's school to the Cross Keys Pub)**

I object to the changes at the Odd Down / Southstoke site because the Wansdyke is an ancient monument, that Bath should be proud to have on its doorstep. Unfortunately, historically it has not been sufficiently valued and protected. English Heritage are trying to restore the monument, BANES should respect this and help preserve this monument for future generations.

**-ECOLOGY/WILDLIFE refCSA22/5 p18**

I object to the changes at the Odd Down / Southstoke site because the area in question is used as a foraging area for an endangered species: the horseshoe bat. They use the trees, but would be hindered by light and noise of any development. The skylark, also endangered, uses the area as a breeding ground. Dark skies are fundamental to retain the beauty of this landscape. Mitigation of these issues is not possible. I also object to the changes because it will increase pollution. Pollution comes in many forms light, traffic fumes, co2 emissions etc, but all damage the ecology of the countryside and is damaging to wildlife and humans. The development will destroy the habitat of creatures and birds, many of which are under threat.

I hope you will take these serious objections into account and revise the proposed changes.

**Change to the policy requested:**

**Respondent Number:** 4597 **Comment Number:** 1 **Respondent Name:** Patrick Dawson

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

- Site Access and transport: CSA22/7 p21

The Core Strategy is unsound in this respect for two reasons. First, no attempt has been made to gauge the effect on increased traffic flows which will inevitably result should these houses be built on the plateau. The planning department propose to leave this to the developers to sort out: a wholly unsatisfactory state of affairs. The B3110 is already heavily used and the A367 coming from Radstock is almost impossible to navigate during rush hour. The whole area will be grid locked – hardly conducive to employers in the new 400,000 sq m office developments being put forward along the river. The second reason is that the map shows "potential road access" along Brantwood's northern boundary to South Stoke Lane. This is essentially a single track road and even with the provision of a roundabout/traffic lights at the Cross Keys is just a disaster waiting to happen.

- Development Plan: CSA22 plus Green Belt map CSA23 Annex 1 page 57

The Core Strategy is unsound in this respect for the following reason: the area proposed by the new Green Belt boundary is sufficient for something in the region of 700 homes based on the density of housing in the Sulis Meadows estate. It is clearly disingenuous to indicate that only 300 houses will be built when clearly the intention is to quickly double this number.

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•Green belt/AONB: CSA/7, CSA/10, CSA/17, CSA/20, CSA/21, CSA/22, CSA/23. B&NES Policy B3a. NPFF Clauses 79 to 88  
The Core Strategy is unsound in this respect for the following reason: the current National Planning Policy Framework is for Green Belt to be redefined only in exceptional circumstances. The bar for redefining Areas of Outstanding Natural Beauty is even higher. In my view, the Core Strategy does not prove that the need to redefine the Green Belt and AONB is exceptional. There are other options and the South Stoke Plateau should be considered the very last option. IN particular all brown field sites should be developed ahead of ANY Green Belt land not only on the South Stoke plateau but anywhere else in B&NES. The World Heritage Site and Wansdyke are considered to be Heritage assets. Here “wholly exceptional circumstance” needs to be proven. Again the Core Strategy does not make a sufficient strong case for this to be the case. It is therefore unsound in this respect as well.

•Heritage Assets: CSA22/6 p19. NPFF Clause 132

For centuries the northern boundary of South Stoke has been the Wansdyke. This proposal to move the Green Belt boundary to within 120 metres of South Stoke is clearly unsound. The South Stoke Conservation Area has still to be adopted due to the wholly unacceptable prevarication by B&NES. The whole purpose of this is to protect against inappropriate development. In addition UNESCO requires a Buffer Zone in order to protect Bath’s World Heritage City status. The current buffer zone is defined by the Green Belt. By definition, redefining the Green Belt removes the buffer zone. This makes the Core Strategy unsound.

•Employment Position: CSA 22/6 pp21-22

The Core Strategy is unsound on this aspect because employment opportunities seem to be suggested by further development on Manor Farm which is outside of the new Green Belt proposal. This would also impact on site access and transport. Any development in this area would be clearly detrimental

•Ecology/Wildlife: CSA 22/5 p18

Dark skies are a fundamental characteristic of this area of Bath allowing for rare bats to forage. Building any houses will be detrimental to this and the numerous sky larks that nest here. It is not possible mitigate and therefore the Core Strategy is unsound in this respect.

**Change to the policy requested:**

The proposed redefining of the Green Belt on the South Stoke Plateau in order to provide developers land to build housing is clearly unsound.

The changes required are:

1. The Green Belt should remain as it currently exists
2. No development on the Plateau should be allowed
3. South Stoke Conservation area should be adopted as early as possible in 2014

**Respondent Number:** 4599 **Comment Number:** 1 **Respondent Name:** Frances Susan Smith (Mrs)

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-  
GREEN BELT/AONB: (ref NPFF Clause 79 to 88)

It is, as it says on the tin, Green Belt land and an Area of Outstanding Natural Beauty!

Why are you considering using Green Belt land to build a new estate of houses, when there are several areas of Brown land in and near this city of Bath that should be built on for housing, long before Green Belt land is even considered for building dwellings in the near future? It has always been understood that Green Belt land should be kept as Green Belt land, so why are you ‘moving the goalposts’ in order to provide dwellings for people on the Housing list, which has probably been increased by the large influx of people who have arrived, and continue to arrive in the UK from Eastern Europe!

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

I am a Bathonian born and bred, and a branch of my family has lived here since 1832. I have lived in my house, here on Sulis Manor Estate, since 1997. I have seen a badger, foxes and hedgehogs on the estate, squirrels visiting my garden, and bats flying at times in the summer months. We are on the edge of the city, but the countryside is just over the fence, and that is how we wish and hope it will remain for many years to come!

The Wansdyke is also to be protected too. It is part of our Heritage. What would happen if you discovered the remains of a Roman villa on the Green Belt beside the Sulis Manor Estate?

DEVELOPMENT PLAN: (see BANES ref CSA22 and their Green Belt diagram CSA23 Annex 1 page 570).

Looking at the development plan shows that it is a much larger area that you intend building dwellings on, than the land used to build the Sulis Manor Estate. Gone will be the country walks and beautiful views and countryside, once houses, roads, gardens, people, transport etc. fill our beloved Green Belt land around this estate and area on Odd Down.

SITE ACCESS AND TRANSPORT: BANES ref CSA 22/7 p21

I see that you intend providing vehicular access and junction enhancement, to facilitate access from Combe Hay Lane, and interconnect with the Sulis Meadows Estate and Sulis Manor, connecting existing roads into the new development. This includes pedestrian and cycle links. More cars and other transport rushing through the narrow roads on this estate, and as we now have numerous taxis and business transport parked and moving around our estate, this will surely increase if and when this new estate is built! From personal experience the Eastern Europeans and others now living on the estate, live more than one couple to a house, and more than one car to the property! We are slowly becoming a suburb of Bristol rather than the beautiful, historic World Heritage City of Bath.

I do not have a car, and I have to use public transport in order to go into the city and environs. The Park and Ride bus service has been, and continues to be, a great support to the pedestrians and elderly residents living on the estate. With more housing, this service will become overwhelmed, and I can say from personal experience that, at present, crossing the roads in the estate to get to the Park and Ride area, becomes a hazard when the residents leave or return to the estate in the early evening. We could do with a Pelican crossing at times especially when standing in the heavy rain trying to cross the road, as the car drivers make their way into the estate without a thought for the pedestrians on the pavements!!

WORLD HERITAGE SITE BUFFER ZONE (Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it. BANES have long said that the green belt protects it. Now it plans to remove this protection.

Well, it says it all in the statement above. Please, please, please reconsider turning this Green Belt Site into another vast estate of houses so close to the green fields, woods, rolling countryside, flora and fauna that we love and value so greatly here in this part of the West Country!!

HERITAGE ASSETS: CSA 22/6p19 ref NPFF Clause 132 (moving the boundary/ protecting the Wansdyke, a national monument that runs through from St Gregory's school to the Cross Keys Pub).

We should continue to protect the boundary of the Wansdyke and the land around it.

We should also consider the skyline views from and near the Wansdyke.

ECOLOGY/WILDLIFE ref CSA22/5 p18 (the area is used as a foraging area for an endangered species e.g. Horseshoe bat). I have already mentioned the ecology wildlife that we enjoy here on Odd Down and on this estate. Too much light, if this proposed estate on the Green land site is built, will certainly affect the fauna in our locality. The lighting from the Park and Ride site can be easily seen from far and wide when the lights have been switched on at night. The wood pigeons are the only ones who enjoy the lights, because they roost on the top of the poles, and keep their feet warm whilst they are switched on!

PLEASE DO NOT BUILD HOUSES ETC. ON THE GREEN BELT AROUND THE SULIS MANOR ESTATE.

**Change to the policy requested:**

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**Respondent Number:** 4615 **Comment Number:** 1 **Respondent Name:** Gerard Cheshire B.Sc, M.Phil (Ph.D). Pp. Sarah Cheshire. **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

On the matter of legality, it is worth pointing out that laws are never in stasis within a democracy, by definition. As views change, so the laws of the land shift to accommodate the general consensus. The relevance here, is that BANES County Council cannot hide behind a wall of legality in the context of its ambitions to build ever more housing in and around the City of Bath, because the wall is perpetually eroding due to the altering opinions of the very people it is elected to represent.

The argument that new housing is ‘needed’ nationally has a primitive logic in reaction to an increasing population size and the increasingly commonplace disintegration of nuclear family units, but the argument is equally flawed when contemplated at a higher intellectual level – not least because the provision of housing only serves to perpetuate and exacerbate these endemic problems. It is to ‘dress the wound without removing the knife’.

In the context of the City of Bath, the flaws are more pronounced because the city is situated within a finite valley, which can only accommodate a certain population size before all manner of problems arise with regard to the effects of overcrowding and traffic congestion. In other words, there is an optimum sum population (residential, working and visitor) size appropriate to the geography of the city and it will become counter productive to allow it to increase further. One must sometimes ignore basic intuition and attend to the counter intuitive in order to adjust planning policy to find the most sensible solution for long-term wellbeing.

The American acronym ‘NIMBY’ (Not In My Back Yard) is often used by those in defence of planning applications against those who object, but it presupposes that objectors would be fine with the idea of development elsewhere. In this instance it is indubitably untrue, as any large housing development in and around the city will adversely affect the existing population in one way or another. Furthermore, expanding the perimeter of the city to claim that more room has been created is misleading and insensible, not to mention morally indefensible.

So, the battle to save the plateau at Odd Down and Southstoke from mass development is really about halting BANES County Council’s short-sighted objectives, in favour of a long-sighted view that seeks to maintain infrastructural equilibrium within the City of Bath and which, ironically, will prevent the council from deteriorating the commercial value of the city, both in terms of its historical heritage and its retail and business potential. Far better to accept that the City of Bath is a finite physical resource and accordingly find ways of optimizing its fiscal turnover as is, than to continue with urban sprawl and watch the city enter an inevitable decline in popularity as somewhere to live, work and visit.

If one thinks of a graph displaying a bell curve, then the apex of that curve is where BANES County Council should want the City of Bath to continue to lie in terms of its aggregate popularity, as that is the optimum expression of their competence as councillors. Should the Core Strategy proposals be allowed to continue unchecked and unabated, then the city’s popularity rating will slide down the curve as the environment it has to offer steadily degrades in quality.

**Change to the policy requested:**

I am requesting, first and foremost, that the proposal for housing development on the Odd Down/Southstoke Plateau be dropped and secondly that all other proposals to build housing on the City of Bath’s greenbelt be dropped also.

With the development of the Foxhill site already sanctioned, and the existence of many brown field sites suitable for development within the existing parameters of the city, there is no defensible excuse for BANES County Council to extend infrastructure and housing beyond established city limits.

Having already outlined the logical arguments against such ideas, above, one can only conclude that either: ulterior

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

motives are playing their part in this process, or the relevant parties are caught in a trend wave which has blinded them to the inevitable consequences down the line, should such foolhardy ambitions be actioned.

Frankly, it beggars belief that I, and so many others, should even be in the position of having to explain to the council why their proposals are so catastrophically flawed. One would have thought that councillors had the wherewithal to 'see the wood for the trees' and possess an innate understanding of their responsibilities toward the people of Bath, the City of Bath and the environs of Bath.

The correct and proper strategy is so plainly obvious that the council must surely already know the right thing do: develop and build on those areas already stained by the urban footprint of human presence and preserve our green fields, leafy hedgerows and shady lanes.

As a qualified ecologist, I feel it is also worth pointing out that the Odd Down/Southstoke Plateau is perilously close to Horscombe Vale, which is an important wildlife conservation area, harbouring a number of scarce and endangered species. As such it is a remnant of the original Somerset wilderness and should be protected from further human encroachment as far as possible. The best way to achieve this is to simply dismiss any ideas of developing farmland adjacent to the vale or within close proximity, including the plateau in question.

As well as the more obvious effects that a development might have on the natural environment, such as littering, pollution, disturbance and habitat loss, there would inevitably be many subtle factors introduced that could very well result in the degradation of the wilderness and the consequent loss of the ecosystem that supports the populations of valuable species. These might include changes to the hydrology of the landscape, the introduction of alien species, predation by domestic animals and so on.

As a footnote, I recently received an amusingly ironic mail-shot from BANES County Council asking whether I supported a 20mph speed limit in Combe Down; to which I replied "Yes, but how do you propose allowing vehicles to drive that fast?" Heaven forbid what the congestion would be like if further housing developments were allowed to continue into our precious countryside.

**Respondent Number:** 4618 **Comment Number:** 1 **Respondent Name:** Mr Cedric Bufton

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

Green belt, Cotswold AONB, South Stoke Conservation Area and Wansdyke Scheduled Monument

The current status of this area recognises multiple unique features and makes further development unsound. Proposed "integrated green space" is a narrow corridor that does not meet the stated requirements for separation or dark habitat. This also has an impact on SAC (Bats). I agree with the Council's comments at 10.5 of BNES 11 and 10.5.6 specifically: "Therefore, pursuing any development either West of Twerton or Odd Down South Stoke Plateau/Odd Down location would be contrary to PPG2."

10.5.10 strengthens this decision for AONB sites and 10.5.15 for Wansdyke scheduled monument and 10.5.24 for Special Areas of Conservation.

Transport and Infrastructure

The area is not well supported by public transport and current traffic is heavy at peak times. The addition of an access road opposite the Cross Keys would destroy the green belt, prevent the economic agricultural use of the land and provide a "rat run" for commuters. This, and the additional traffic from the Foxhill development would, in my opinion, make the proposed changes unsound.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

The changes proposed to the Core Strategy in SPC 88 should be removed and plans to develop on Green belt at Odd Down stopped.

**Respondent Number:** 4629 **Comment Number:** 1 **Respondent Name:** Gerard Cheshire B.Sc, M.Phil (Ph.D). Pp. Sarah Cheshire. **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**Support: 

On the matter of legality, it is worth pointing out that laws are never in stasis within a democracy, by definition. As views change, so the laws of the land shift to accommodate the general consensus. The relevance here, is that BANES County Council cannot hide behind a wall of legality in the context of its ambitions to build ever more housing in and around the City of Bath, because the wall is perpetually eroding due to the altering opinions of the very people it is elected to represent.

The argument that new housing is 'needed' nationally has a primitive logic in reaction to an increasing population size and the increasingly commonplace disintegration of nuclear family units, but the argument is equally flawed when contemplated at a higher intellectual level – not least because the provision of housing only serves to perpetuate and exacerbate these endemic problems. It is to 'dress the wound without removing the knife'.

In the context of the City of Bath, the flaws are more pronounced because the city is situated within a finite valley, which can only accommodate a certain population size before all manner of problems arise with regard to the effects of overcrowding and traffic congestion. In other words, there is an optimum sum population (residential, working and visitor) size appropriate to the geography of the city and it will become counter productive to allow it to increase further. One must sometimes ignore basic intuition and attend to the counter intuitive in order to adjust planning policy to find the most sensible solution for long-term wellbeing.

The American acronym 'NIMBY' (Not In My Back Yard) is often used by those in defence of planning applications against those who object, but it presupposes that objectors would be fine with the idea of development elsewhere. In this instance it is indubitably untrue, as any large housing development in and around the city will adversely affect the existing population in one way or another. Furthermore, expanding the perimeter of the city to claim that more room has been created is misleading and insensible, not to mention morally indefensible.

So, the battle to save the plateau at Odd Down and Southstoke from mass development is really about halting BANES County Council's short-sighted objectives, in favour of a long-sighted view that seeks to maintain infrastructural equilibrium within the City of Bath and which, ironically, will prevent the council from deteriorating the commercial value of the city, both in terms of its historical heritage and its retail and business potential. Far better to accept that the City of Bath is a finite physical resource and accordingly find ways of optimizing its fiscal turnover as is, than to continue with urban sprawl and watch the city enter an inevitable decline in popularity as somewhere to live, work and visit.

If one thinks of a graph displaying a bell curve, then the apex of that curve is where BANES County Council should want the City of Bath to continue to lie in terms of its aggregate popularity, as that is the optimum expression of their competence as councillors. Should the Core Strategy proposals be allowed to continue unchecked and unabated, then the city's popularity rating will slide down the curve as the environment it has to offer steadily degrades in quality.

**Change to the policy requested:**

I am requesting, first and foremost, that the proposal for housing development on the Odd Down/Southstoke Plateau be dropped and secondly that all other proposals to build housing on the City of Bath's greenbelt be dropped also.

With the development of the Foxhill site already sanctioned, and the existence of many brown field sites suitable for

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

development within the existing parameters of the city, there is no defensible excuse for BANES County Council to extend infrastructure and housing beyond established city limits.

Having already outlined the logical arguments against such ideas, above, one can only conclude that either: ulterior motives are playing their part in this process, or the relevant parties are caught in a trend wave which has blinded them to the inevitable consequences down the line, should such foolhardy ambitions be actioned.

Frankly, it beggars belief that I, and so many others, should even be in the position of having to explain to the council why their proposals are so catastrophically flawed. One would have thought that councillors had the wherewithal to 'see the wood for the trees' and possess an innate understanding of their responsibilities toward the people of Bath, the City of Bath and the environs of Bath.

The correct and proper strategy is so plainly obvious that the council must surely already know the right thing do: develop and build on those areas already stained by the urban footprint of human presence and preserve our green fields, leafy hedgerows and shady lanes.

As a qualified ecologist, I feel it is also worth pointing out that the Odd Down/Southstoke Plateau is perilously close to Horscombe Vale, which is an important wildlife conservation area, harbouring a number of scarce and endangered species. As such it is a remnant of the original Somerset wilderness and should be protected from further human encroachment as far as possible. The best way to achieve this is to simply dismiss any ideas of developing farmland adjacent to the vale or within close proximity, including the plateau in question.

As well as the more obvious effects that a development might have on the natural environment, such as littering, pollution, disturbance and habitat loss, there would inevitably be many subtle factors introduced that could very well result in the degradation of the wilderness and the consequent loss of the ecosystem that supports the populations of valuable species. These might include changes to the hydrology of the landscape, the introduction of alien species, predation by domestic animals and so on.

As a footnote, I recently received an amusingly ironic mail-shot from BANES County Council asking whether I supported a 20mph speed limit in Combe Down; to which I replied "Yes, but how do you propose allowing vehicles to drive that fast?" Heaven forbid what the congestion would be like if further housing developments were allowed to continue into our precious countryside.

**Respondent Number:** 4629 **Comment Number:** 2 **Respondent Name:** Mr A K Foster

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

We object to the Southstoke Plateau being included within the Strategic Plan for housing development for the following reasons:

We do not believe that the designated Green Belt area should be changed to allow development on the Southstoke plateau.

We do not believe that it should be possible to take areas out of the green belt and feel strongly that this will set a precedent allowing further erosion of the green belt to come in the future.

This area is a feeding I breeding area for Sky Larks and supports much wildlife.

We believe that the additional traffic congestion around the Glass House roundabout I Midford Rd I Bradford Rd from this

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

proposed 300 housing development ADDED to the additional Fox Hill housing development traffic will extend the existing rush hour gridlock to this area throughout much of the day.

**Change to the policy requested:**

We request that the proposed housing development on the Southstoke plateau [Odd Down I Southstoke,] is removed from the strategic core policy.

**Respondent Number:** 4630 **Comment Number:** 1 **Respondent Name:**

**Respondent Organisation:** Rescue, The British Archaeological Trust

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

Rescue - The British Archaeological Trust is a non-political organisation dedicated to supporting archaeology and archaeologists in Britain and abroad. We do not receive any state support and are entirely dependent on the contributions of our members to support our work. We objected to this element of the proposal and our objections stand in relation to this latest consultation.

We believe that the change to the Core Strategy for Bath and North-East Somerset and loss of the green belt land, will have an unacceptably negative impact on both the western Wansdyke Scheduled Ancient Monument and Bath World Heritage Site. We are particularly concerned by phrases such as 'avoid substantial harm to the Wansdyke SAM'. Scheduled Ancient Monument legislation is prohibitive - no harm is to be caused to the monument. It should be noted that harm includes harm to the setting and curtilage of the monument, and that views from monuments as well as to them are protected by the legislation.

The change to the core strategy in this area will destroy the open landscape context of the Wansdyke, which has already been lost immediately to the west of the proposed development area, and the construction of the new road scheme will risk causing physical damage to the monument itself. Such monuments are vital to our understanding of our development as a nation from individual kingdoms, and defining and understanding the termini of these linear monuments, is often key to interpreting the boundaries reflected by them. The loss of any part of this highly significant monument is unacceptable.

Any development in this area will have a serious impact on the landscape setting of the site even if full survey and excavation takes place as part of it (as it most certainly should under the provisions of the National Planning Policy Framework, the relevant planning guidance document). We believe that the current proposals to a change to the core strategy to include this area, conflict with the protection afforded to the monument by the 1979 Ancient Monuments and Archaeological Areas Monuments Act, and contravene the UK's commitments to the protection of the historic environment set out within the Valletta Convention (1992).

The proposed development area also lies adjacent to a conservation area and an UNESCO World Heritage Site, both designations which afford protection to the adjacent built environment. World Heritage Sites are considered to be heritage assets of the highest significance (National Planning Policy Framework 132ff) and, as the UK is a state party to the World Heritage Convention, are recognised in International law. There are two examples of Case Law (Bath Society v. Secretary of State [1991] 2 P.L.R.51 and Coal Contractors Ltd v. Secretary of State [1995] J.P.L. 421) whereby the impact on a World Heritage Site has been deemed to be the most significant material consideration. Both cases were successfully found in favour of the WHS; and it is notable that the Coal Contractors v. Secretary of State related to the visual impact of opencast mining for only a short period (unlike permanently as here) within the setting of the WHS (i.e. outside its boundary, as in this case).

Whilst Rescue accepts that there has been some mitigation proposed with soft landscaping and natural areas included to minimise the effect on the Scheduled Ancient Monument and World Heritage Site, Rescue believes that only the removal of proposed development in the Odd Down area and the maintenance of the Green Belt around it will offer satisfactory protection.

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Removal of the Odd Down allocation from the Core Strategy.

**Respondent Number:** 4642 **Comment Number:** 1 **Respondent Name:** Debbie Bensley  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**Support: 

I do not support the South Stoke plateau amendments, although there are specific areas now with more detail like near the Wansdyke being left as an open space with housing not going completely to the border I still feel it should be totally kept as Green Belt and never built on.

There is a housing need but there are other areas that should be used rather than an area of ANOB with a historical ancient scheduled monument alongside it-once Green Belt is built on it is lost forever and this destruction cannot be reversed.

The amendments although more detailed I believe have been rushed into and the true impact on the surrounding area and the total lack of foresight will prove (if the go ahead to build happens) to have a very negative effect on those living near the plateau. There is not the road infrastructure to cope with the increase in traffic volume to local roads which are already under strain at peak times especially along the A36 coming in from Peasedown St John and the roads coming from Combe Down into Odd Down by Sainsburys (the Fox Hill build will add further traffic/congestion).

If Sulis Meadows was connected by road to the potential new housing then further on towards South Stoke this would create a rat run with vehicles trying to cut across. The entrance to Sulis Meadows cannot cope with an increase of traffic and during School drop off/pick up this is a logistical nightmare already with parents parking on double yellows/corners etc.

**Change to the policy requested:**

I would like the whole proposal rejected and I do not believe any of the amendments would have a positive impact on the area and its current residents.

The main issues are as stated above traffic congestion, road infrastructure plus the areas current status- Green Belt ANOB etc.

**Respondent Number:** 4643 **Comment Number:** 1 **Respondent Name:** Joanna Campbell  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**Support: 

I believe that the Core Strategy is NOT legally sound because I do not believe that the Council have considered the points in NPPF para 115/116 adequately, as I have elaborate in page 2 at length.

I object strongly to the proposed amendments (CSA 22), and believe the Core Strategy Ammendments to be unsound for the following reasons:

-NPPF( para 115/ 116): These fields are AONB, and as such should have the highest protection in the land, protected by law. We live adjacent to these fields, trusting in our government to uphold the laws of the land. If a precedent is set by abandoning these laws, what laws can we trust! Although there is a need for housing, the council has not demonstrated that other sites have been exhausted. By increasing the density of houses scheduled on the brownfield sights by 10%, which is easily doable, there would be no need to destroy these fields. To do otherwise is pandering to developers instead of supporting voters.

The council has not demonstrated that areas in the neighbouring counties have been considered for development. We understand that the greatest need is for 'affordable homes'. With the high price of land within the city of Bath, this is difficult to achieve. However, in Wiltshire, there is, I understand, scope to build, and the housing would be considerably cheaper. Added to that, there are good transport connections with several neighbouring towns, eg Chippenham, Trowbridge etc

Para 116 mentions national considerations. Bath is the ONLY WORLD HERITAGE CITY IN UK, and as such needs to be protected. The setting is as valuable as is the city itself. The council has long said that the green belt is the buffer zone required for Bath to qualify for this status. This green belt protects against urban sprawl. The proposed development would remove the buffer & be exactly that, URBAN SPRAWL.

The NATIONAL HERITAGE – WANSDYKE is an ancient monument that also needs protection. The proposed plans do not protect it adequately, given the increase population that would have access to it.

#### THE ECOLOGY – PROTECTED HORSESHOE BATS/ SKYLARKS

The proposed measures to protect these two species are not adequate. Bats need darkness, and housing so close to their foraging areas would not allow this. How can skylarks make nests in concrete? They need open spaces. These fields are their current habitat.

These fields also provide pleasure to many people to walk, de-stress and exercise dogs etc. To remove this access would be detrimental to our recreational opportunitie, mentioned in para116.

In CSA22 Placemaking Principles/ Land Requirements : None of these seem adequate to protect the environment. The buffer zone to protect the South Stoke Conservation area is hardly that, far too small, and that charming village will, in effect become part of Bath, its character not protected at all.

The Cross Keys pub is grade 2 listed building, and it would be detrimental to have building so close, to say nothing of a possible round about.

Sulis Meadows Estate is, at the moment, small enough to be friendly, quiet and safe. Were 300 additional houses to be built surrounding it, especially if access were to be given, it would cease to be this. We bought our houses for these reasons, and value those reasons highly, and do not want to give them up, to say nothing of a drop in value of our homes. The roads through the estate are not built to take more traffic. I object, therefore, very strongly. I do not believe that the council has considered these points. This proposed development would definitely have a detrimental effect on our environment landscape and recreational opportunities. At the moment the children are able to play outside, on some of the roads, and we want this to continue.

TRAFFIC CONGESTION- The main roads that circumvent South Stoke Plateau are often congested at the moment. When the nearby Sainsburies applied for planning permission, it was seen that the Red Lion roundabout was at capacity then. Around 700 houses have been designated for Fox Hill further along the North Road. There is no way to widen this, or the Wellsway, B3110, or the A367 through Odd Down. Traffic at peak times already queues from Dunkerton Hill to enter Bath, To consider building 1000-1200 houses that would use these main roads seems incomprehensible! Council officers had no suggestions when asked.

To add to that, if there were to be entrances to the proposed development at Combe Hay Lane & South Stoke Lane, the likelihood of a RATRUN would be strong, and detrimental to those living there

#### **Change to the policy requested:**

For the reasons listed above I strongly request that the proposed development for the Odd Down/ South Stoke Plateau should be abandoned, in the interests of the City of Bath and its inhabitants, and the local surroundings. The current green belt, AONB, UNESCO World Heritage city of Bath, and the Wansdyke should all be protected, and remain as they are.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4647 **Comment Number:** 1 **Respondent Name:** Gerard Coles**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

I am writing regarding the B&NES core strategy amendments.

I am unable to find any "exceptional circumstances" as defined by The National Planning Policy Framework which would support development of the South Stoke plateau, the proposed amendments would therefore appear to be unsound (Ref: CSA/7, CSA/10, CSA/17, CSA/20, CSA/21, CSA22, CSA/23. B&NES Policy B3a and NPPF Clauses 79 to 88).

Development of the plateau would remove the buffer zone offered by the greenbelt, UNESCO sites require such a zone so our city's UNESCO status would be lost if the plateau is developed.

As well as it's cultural and historic significance, the plateau is an important natural habitat which will be lost should development go ahead.(Ref CSA 22/5) .

The BANES Core Strategy Amendments are not sound. If the plateau is developed it will be to the detriment of the the entire City of Bath.

**Change to the policy requested:****Respondent Number:** 4650 **Comment Number:** 1 **Respondent Name:** Mr. G. Davis & Ms. T. Rodrigues**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

We consider these amendments to render the Core Strategy as UNSOUND. They remove the important protection needed for the Conservation Area of the village of South Stoke, the World Heritage setting of the City of Bath, the Cotswold Area of Outstanding Natural Beauty, and the Wansdyke Scheduled Ancient Monument. They undermine the principal of permanence of the Green Belt and run counter to the statements in the National Planning Policy Framework intended to provide such protection.

CSA.20 - We reject the assertion that there is a need for additional housing and that this needs to be provided on land that is in the Green Belt, an Area of Outstanding Natural Beauty, is part of the World Heritage Setting of the City of Bath, is the setting for the Scheduled Ancient Monument of the Wansdyke, and is the setting of the South Stoke Conservation Area.

Firstly the figures provided by B&NES Council state that there is only a need for 8,727 houses. However, they argue that in order to persuade developers to build the required 3,290 affordable homes, an additional 4,213 market housing should be built. But these 4,213 houses are not needed, so who will buy them? The developers will wish to build houses on the Green Belt land first, because that is easier and is a more marketable location. Brown field sites will be a low priority for them and will therefore not be built on because there is no actual need. This runs counter to all the statements in the National Planning Policy Framework – Section 9. Protecting Green Belt Land. No exceptional circumstances or conditions

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

have been given to justify running counter to these NPPF statements.

CSA.21 – Emphasises the importance of the permanence of Green Belt boundaries, yet these amendments seek to make such a change. The Green Belt was designated for good reason. CSA.22 is an absolute litany of the harm that is going to be caused if these amendments go ahead. You can't minimise harm to an open space like the South Stoke Plateau. If you build in it you harm it – that's it, gone forever. What is lost? Valuable open space for recreation, the World Heritage Status of Bath, Landscape of Outstanding Natural Beauty, Wildlife – Bats and Skylarks, a scheduled ancient monument (it will just disappear as it has near the Sulis Meadows estate), the separation of the village of South Stoke from the city of Bath. This is too high a price to pay for housing, the need for which is highly questionable.

CSA.22 – Is intended to allay fears of harm to this area, whereas in fact it catalogues exactly the harm these amendments will cause. Furthermore, even though the number of houses for this site is given as 300 at 35 -40 dwellings per hectare, the area removed from the green belt shown in the Key Diagram is enough for 700 houses. As sure as night follows day, all 700 dwellings will be built in due course, for unprotected by Green Belt status there will be no reason not to grant permission to the inevitable applications and appeals. It would be pointless to argue that it was never intended to build in the remaining area, because the obvious counter argument would be – so why wasn't it designated as Green Belt in the Core Strategy.

**Change to the policy requested:**

No land should be removed from the Green Belt in order to provide housing, much less land which also contributes to the World Heritage Setting of the City of Bath, contributes to the Setting of a Conservation Area, and additionally in this case is also an Area of Outstanding Natural Beauty, and forms the setting of a Scheduled Ancient Monument.

These amendments to the Core Strategy need to be changed to provide a higher proportion of affordable housing delivery and the use of other sites, such as existing brown field sites, to remove the need for this unjustified loss of very important Green Belt.

**Respondent Number:** 4656 **Comment Number:** 1 **Respondent Name:** Dr. S.R. Pennock & Mrs D.J. Pennock **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**Support: 

The core strategy shows several possible alterations to the Green Belt Boundary in the diagrams CSA23, CSA24, Option BT1 and Option BT2. These alterations are unsound as they fail to meet the development requirement laid out in Policy B3A to develop 300 dwellings. All of the the possible alterations to the Green Belt Boundary are far bigger than needed and so clearly do not meet the requirement to develop 300 dwellings.

The development of the large areas indicated in the diagrams CSA23, CSA24, Option BT1 and Option BT2 all lead to the merger of South Stoke with the City of Bath. This contradicts Section 9 of the NPPF 'Protecting Green Belt Land' where a purpose of a Green Belt is to prevent merger, and the core strategy as outlined is unsound as it fails to identify the exceptional circumstances that should arise for the land in question on the South Stoke Plateau to be taken out of the Green Belt.

The proposal indicates that dwellings can be built right up to the Scheduled Ancient Monument of the Wansdyke in all but BT2. This renders this part of the Wansdyke as little more than a hedge, as has happened in the development of Sulis Meadows. This does not leave this part of the Wansdyke observable in its original form as an important boundary that is visible for some distance. The 'clear and convincing justification' required by NPPF Clause 132 for the harm and loss of this part of the Wansdyke that the development will cause is not made in the core strategy amendment, and as such the core strategy amendment is therefore unsound.

The plans in B3A Section 5 on Landscape and Ecological Mitigation are also unsound.

1) The plan to produce light levels equivalent to a full moon every night of the year as outlined in B3A Section 5 does not protect the dark skies to the south and east of Bath. It may be possible to limit the street lighting by design, but the light levels from all of the 300-900 new dwellings can not be controlled.

2) Building houses over land currently frequented by skylarks, horseshoe bats and other wildlife does not preserve their habitat, particularly during the building phase.

3) The proposed change to the Green Belt Boundary will have detrimental effects on the Cotswolds AONB, the setting of the South Stoke Conservation Area, the character of the Sulis manor Plateau, the characters of the local roads and the Scheduled Ancient Monument of the Wansdyke. The proposal is for a large area of dwellings to be built over what is currently a open field area punctuated with hedges and trees and the Sulis Manor. Surrounding this developed area with trees and bushes may produce a visual barrier that is largely ineffective in the winter, and which could quite easily be removed in future years, but it does not leave an area of outstanding beauty or one for conservation, or allow viewing of the Wansdyke in its original environment. Combe Hay Lane, South Stoke Lane, the Midford Road and the Cross Keys junction do not maintain open rural views – the view will become dwellings or trees and bushes attempting to hide the dwellings. The roads will all need to be upgraded and widened significantly to accommodate the increased traffic, particularly if there are 700-900 dwellings built within the area proposed to be taken out of the Green Belt.

The plans in B3A Section 6 fail to preserve a buffer zone on the southern edge of Bath. This contradicts the UNESCO requirement to have a buffer zone around the World Heritage City of Bath. It is difficult to see that the plans to limit lighting, heights and density of building can be maintained once the Green Belt boundary moves to its proposed position. Hence Section 6 is also unsound.

**Change to the policy requested:**

The proposals in Section 7 and 10 of Policy B3A in respect of car parking for St Gregory's School and Odd Down Football Club could be combined into one. If the current facilities at Odd Down Football Club are enhanced the two institutions are very close to each other, and their car parking requirements occur at different times of the day or week.

**Respondent Number:** 4666 **Comment Number:** 1 **Respondent Name:** Mrs Jane Hellard

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

I feel that allocating a site for development on this area of land is contravening the purpose of its status as AONB, Green Belt and the setting of the Site of Ancient Monument. This designation should surely protect this land which provides part of the 'Buffer Zone' to the WHS of Bath, protects part of The Wansdyke, prevents coalescence of the beautiful conservation village of South Stoke with Bath, provides a natural habitat for animals, bats and rare birds (eg Skylarks) and amenity value for villagers and Combe Down residents.

BANES has been encouraged to consider this particular area by the landowner but reports prepared specifically by BANES prior to this consultation emphasise the harm that would be caused by development on this site. Any development across the site on the area of land considered by BANES to have the lesser adverse impact would still cause irrevocable harm to the setting of South Stoke and development on the scale suggested would incur hugely increased traffic congestion. Even the larger local roads are unable to cope with the present volume of traffic flowing to and from Bath at key times of day.

Maybe Bath should be considered to be a 'special case' and so should not be overdeveloped. If development is forced onto this special site and a greater area of land is removed from the Green Belt what will prevent further development in time which would irrevocably harm this remarkable area?

I feel the removal of this land from the Green Belt for the allocation of a housing development is not justified.

**Change to the policy requested:**

I would like to see clause SCA22 deleted from the Amendments to the Core Strategy. If some development in this Green Belt area is proved to be essential and in the public interest it should be entirely contained on land west of Sulis Manor to minimise the harm to the Conservation village of South Stoke and the Wansdyke Ancient Monument.

**Respondent Number:** 4671 **Comment Number:** 1 **Respondent Name:** Colin Webb

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

It is with deep regret and considerable anger that many people living in Bath and from many other places around the world are observing the continuing debate about the potential destruction of a key location within the special Green Belt environs of Bath. My comments previously submitted in May 2013 remain fully pertinent to these latest proposed amendments to the Core Strategy.

This planning process has been clouded with jargon and obfuscation from the beginning and is now so complex that it inhibits the average person from being able to comprehend the procedures, recognise the acronyms and competently manage to complete this form. This and the Council's lack of consultation or debate with their constituency is testimony to the incompetence, inconsideration and philistine manner in which BANES had handled this issue from the outset, and recalls the spectre of The Sack of Bath some 40 years ago.

The revised proposals make mockery of the Secretary of State's commitment published 26th March 2013 in which he stated that the Government reforms "safeguard our glorious green spaces and countryside. They protect the green belt - that vital green lung that prevents urban sprawl. And they defend Areas of Outstanding Natural Beauty, and other important environmental designations. Nothing will change that today. Nothing will change that tomorrow."

To quote the distinguished writer Adam Fergusson: 'If I were the Minister, or the Secretary of State, or his Inspector, reviewing new proposals for in-and-around Bath, I would say this: "Plan as you please, but don't come back to me to approve any development in the countryside until every brown-field acre in this world-heritage site has been used up; and every existing building properly occupied. And don't then bring me a plan which isn't written in plain, simple English." And, even after that I would add that the green belt round Bath is not negotiable.'

CSA 22 – Policy B3A [Ref: BANES ref: CSA22 1. page 17 and their "Green Belt" diagram CSA23. Annex 1 page 57]. The area enclosed by the proposed new Green Belt Boundaries is sufficient for between 650 and 700 houses based upon the current "Sulis Meadows" density. If it is proposed that 300 dwellings are needed then why has so much more land been allocated in the plan?

[Ref: CSA 22/5 p18]. ECOLOGY/WILDLIFE:

Specific expertise from prior assessments has identified the area as a foraging area for rare species of bat. Though they make use of the tree belts, they would be greatly disturbed by noise and light created by new development. Dr Roger Ransome, on behalf of BANES, undertook a survey to identify the foraging areas of the bats. He found that the head of the Horsecombe Valley linked north east at Southstoke was the main foraging area for the both adult and immature Greater Horseshoe Bats. It is perverse for BANES to spend a very large amount of money to protect this species when filling in the mines at Combe Down, to then propose to undertake a building development which puts its main foraging area at risk.

The area is also a long established breeding ground for skylarks. Concreting over their nesting sites will cause serious harm. As the RSPB report "Its recent and dramatic population declines make it a Red List species." Dark skies are a fundamental feature of this precious landscape. This will be lost forever. Mitigation of these issues is not possible

Further as reported by local expert Jill Pizey the development poses a considerable knock on risk to the delicate ecology of

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

the Horsecombe Valley. Horsecombe Brook, which runs though the valley, arises from springs at its head, which are only a few hundred meters from the fields at the Midford Road-Southstoke Road junction. Any disturbance to the water drainage into Horsecombe Brook, which would be caused by building in the field opposite the Cross Keys pub poses a severe threat to this very special and delicate ecological site.

There are ecological reports that confirm the valley contains approximately 200 varieties of wild flowering species. Many butterflies and moths are to be found in the fields and wood. Recently the rare Dark Green Fritillary has been identified.

Ref: CSA22/6 p19 and ref NPFF Clause 132. HERITAGE ASSETS:

Clause 6; The Wansdyke

There is no timetable for the proposed 'Management Plan' to be 'developed in consultation with English Heritage and form part of the development proposals.' Such is the major archaeological significance of the monument that any such 'Management Plan' must surely be secured and assessed as being fundamental and defined well ahead of the any potential approval to the amendments to the core strategy proposed.

If the Southern boundary zone should remain undeveloped it should remain in the Green Belt. If the Wansdyke is to be protected from development, the area in front of it must remain in the Green Belt. If South Stoke Conservation Area is to be protected against inappropriate development, any areas that on the concept diagram that might affect it, should remain in the Green Belt. For centuries the Northern boundary of South Stoke has been the Wansdyke. That should be retained for all time.

[Ref: CSA22/7 p21]. SITE ACCESS AND TRANSPORT:

This same map shows a "potential access road" to the new development along Brantwood's northern boundary to South Stoke Lane. This lane is barely more than single track and cannot cope with increased traffic. Any access from the East would guarantee the urbanisation of the whole plateau over time.

The main Midford Road (B 31110) is already a heavily congested route at peak times with solid traffic in and out of the city flowing from east to west and into Bath via the Wells Way, or diverting by turning right from the East into Southstoke Road (a bus route) and then collecting at the junction with Bradford Road for routing down to the city via Entry Hill (and established rat run which has not been mitigated by 20MPH signs on Entry Hill nor speed humps). The number of accidents at this junction is now legendary.

The planned Foxhill/MOD development will further exacerbate the problem with no direct routes planned to exit the site southerly into Bath. The congestion will inevitably increase with the potential of some additional cars (300?) that could conceivably flow into the system from the 'potential' vehicle access into Southstoke Lane which would only be inadequately mitigated by 'upgrading the Cross Keys junction.'

Any improvements to the Cross Keys junction should be only to increase current safety, not to facilitate urban encroachment across the plateau and the consequent increase in traffic flows through the village and into the immediate areas south of the plateau.

Conclusion:

The plan if implemented will achieve the urbanisation of the entire area of this stunning southern landscape of Bath. The potential traffic grid lock for commuters travelling in and out of the city and the concomitant chaos for established residents combined with the compromising or destruction of such inspiring landscape, ecology and heritage would be a brutalism in planning worthy of the commissars of communism.

Change to the policy requested:

**Respondent Number:** 4677 **Comment Number:** 1 **Respondent Name:** Mr Stephen Rose

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

I am writing to you to strongly object on a number of counts to the proposed housing development on the Green Belt area of outstanding natural beauty site at the South Stoke Plateau. Firstly however I do not accept that this process has been carried out thoroughly and robustly by the council. A significant number of my fellow residents and I were largely unaware of the ramifications of these proposals, ostensibly due to the failure and neglect of the council to adequately publicise the consultation phase in its earlier stages, thereby rendering the whole process 'fundamentally flawed'. Consequently, this has resulted in many residents being adrift with several critical aspects of the 'proposals', and being inadequately prepared to comment in an informed and constructive manner in an appropriate fashion.

In relation to the housing development itself I do not support the proposals to build houses on South Stoke Plateau for several key reasons, firstly because of the debilitating impact it will have on the already overburdened transport infrastructure. I am Assistant Principal at The Ralph Alien School, where I have worked for three and a half decades with specific responsibility for managing the schools transport. Indeed I am currently working with Councillor Roger Symonds (Combe Down Ward) on these very issues! Since 1982 not only have I personally travelled along the south corridor route, but on a daily basis I have to deal with the impact of students wrestling their way to school on foot, by bicycle, by bus and by car. My first hand experience over many years of the increasing impact the escalating levels of traffic have caused, and the devastating effects of the current levels of congestion, afford me a thorough appreciation of the potential impact the proposals would have.

Not only is it inconceivable to support any proposal which will further exasperate already intolerable congestion, it appears that little or no consideration whatsoever has been given by the council to the safety of those currently travelling along this route. The mere suggestion to further compound the situation with even more traffic, managed in any proposed clever fashion with a 'slip road' at the rear of a housing development, is beyond negligent and flies in the face of all the councils safeguarding policies. Having personally dealt with a number of injured students over the years travelling to one of eight schools situated along the south corridor, I am extremely concerned about the potential impact of any proposal, however smart, to increase the traffic on an already overburdened road infrastructure. In summary I cannot object strongly enough to the consequential congestion, pollution and the increased road danger that will undoubtedly compromise student safety not only for our students, but also for all of those students, especially those of primary age. As for the impact on Southstoke Road itself, the northern end junction is already exceedingly dangerous, as I have experienced myself, so any proposal to create another significant road hazard at the other busy junction is just not viable, sustainable or sensible. I personally fear that the endless obsession to develop this wholly inappropriate site for housing will inevitably result in tragedy and will unequivocally compound the currently gridlock being experienced both morning and afternoon by thousands of local residents.

Secondly the proposal is unsound in relation to the area being designated as 'Green Belt' as this legislation seeks to prevent the coalescence between settlements, which has already very recently been acknowledged as 'narrow'. Additionally, it is an area of outstanding natural beauty, and from reviewing BANES's policy relating to Green Belt and AONB it is very evident that it contradicts the councils own stance with these areas. Furthermore I am very concerned to read the UNESCO website which makes clear its views about the erosion of Green Belt land on the parameter of our World Heritage City. I find it hard to believe that Bath's own council would potentially jeopardise this cardinal status.

Thirdly the archaeological features of The Wansdyke are an irreplaceable feature which deserves the rightful protection the council can offer it. The proposal to overwhelm it by simply running access roads to the eastern edge, western edge and straight through the middle of it, clearly demonstrates a total lack of due consideration for an Ancient Monument which is both unique and fundamental to our heritage.

In conclusion to the proposed housing development on South Stoke Plateau I believe it to be unsound, and consequently it should be rejected. I am however aware of the council's proposals to redevelop the existing Foxhill MOD site for residential dwellings, as I do accept that as this is somewhat part of the existing infrastructure and it is a more empathetic proposal which would be more sustainable in terms of the local environment and community.

I trust you find my comments helpful in relation to the Housing Planning Proposals,

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:****Respondent Number:** 4683 **Comment Number:** 1 **Respondent Name:** Christina Sandford**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

World Heritage Site

Bath is a world heritage city partly because of its setting and removing these fields from the Green Belt would severely endanger this status. A cordon sanitaire around the city is essential.

The Wansdyke

It is our duty to preserve this as far as possible for future generations. Removing a field alongside the Wansdyke from the Green Belt is irresponsible. Even if the field becomes a football pitch in the near future, the fact that it is outside the Green Belt does not protect it long term.

House Numbers

It has not been proven that Bath needs the number of houses stated. Homes in the new development at Norton St Philip have not been selling easily. The amount of land removed from the Green Belt would support at least twice the number of houses proposed, so presumably a larger development is considered eventually. We should be addressing real housing needs now.

AONB and Green Belt

No exceptional circumstances have been proved to allow building in the AONB or Green Belt.

Wildlife

CSA 22 states "Safeguard skylark interest". Skylarks are hardly likely to remain in the small area which will remain as Green Belt. Losing their habitat on the edge of a city, they will disappear. Any development will also threaten the foraging areas of the greater and lesser horseshoe bats

**Change to the policy requested:****Respondent Number:** 4686 **Comment Number:** 1 **Respondent Name:** Fiona Gourley**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

I believe that the plan is totally unsound because the whole South Stoke/ Odd Down plateau area lies within the Cotswold AONB. B&NES cannot move the AONB boundary (which was established in 1987) and as the area has the same protection as a National Park, development can only be permitted in "wholly exceptional circumstances". This has not been proven. [NPPF 79-88]. [CSA22, CSA23, CSA24]

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

There are approximately 370 houses on the Sulis Meadows estate. Yet the land proposed for South Stoke/ Odd Down plateau would hold about 700 homes at the same density. As the landowner has previously proposed building 2,000 high-density dwellings plus large industrial and retail units on rural farmland, it is extremely worrying that the entire plateau is being "unlocked". The 300 houses is only the thin end of the wedge for the entire plateau to be developed in coming years. Any further development for employment purposes around Manor Farm would seriously damage Green Belt, AONB, WHS and South Stoke conservation area. [CSA22.6, CSA22.9, CSA23 & 24]

B&NES states that the World Heritage Site of Bath does not need a buffer zone because it is protected by the Green Belt and AONB. Yet it is proposing to build within this protective zone by pushing back the Green Belt boundary at its narrowest point on the southern boundary. This endangers the World Heritage Status. [CSA 22/6, CSA23/24]

The proposed changed Green Belt boundary would enable building to take place within 120m of the South Stoke Conservation Area. This will lead to the coalescence of the village with the Bath city boundary. If the 2011 South Stoke Conservation Zone Extension Plan which was developed jointly by the South Stoke Parish Council with B&NES planners in 2011 was adopted (encompasses Brantwood inter alia), then there would be no buffer zone. Ironically, the proposed buffer zone is at its narrowest point closest to the village. This makes a mockery of the proposal to protect the setting of the South Stoke conservation area and setting [CSA 22.6, CSA23/24].

The South Stoke plateau area includes high risk heritage assets, in particular the Wansdyke Scheduled Ancient Monument, which is already compromised by development at Sulis Meadows. Total assessment is needed as interesting archaeological investigations are planned by the University OF Bath next year. Development in this area will only increase the impact on the Wansdyke and the proposed protection B&NES in their latest amendment is not adequate. [CSA22.6, NPPF 132]. In addition, it is a nesting area for endangered birds, particularly skylarks, and a feeding area for great and lesser horseshoe bats. These would be disturbed by any development on the plateau. [CSA22.5]

**Change to the policy requested:**

The entire strategic site allocation at the South Stoke/Odd Down plateau should be removed from the plan. Building in the AONB / Green Belt here would cause great damage. The housing targets should be reduced to make building at this location unnecessary.

**Respondent Number:** 4702 **Comment Number:** 2 **Respondent Name:** Richard Cross

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

I wish to comment on Change Reference CSA22 - Strategic Site allocation Odd Down/Southstoke. I Consider that the Core Strategy Amendment proposal to remove the Odd Down/Southstoke site from the Green belt is not justified or consistent with national planning policy for the following reasons.

1) The site is currently entirely in the green belt and borders the Cotswold AONB and the Wansdyke path (a scheduled ancient monument.) Any development on this site must only happen under exceptional circumstances (NPPF Clauses 79 to 88). This proposal does not meet "exceptional circumstances" as the provision for the 300 houses could and should be met by developing existing brown field sites and sites not in the green belt within the current boundaries of the city of Bath.

2) The site forms the buffer zone for the UNESCO world heritage site of the city of Bath. The proposal to remove this site from the Green Belt means the potential loss of this buffer zone to development. Light pollution from development of this site will be visible for many miles from the areas south of the escarpment.

3) The area is the last undeveloped part of the Costwold limestone plateaux in the south of Bath as as such provides irreplaceable wildlife habitats for many species of plants and animals, including rare and endangered species of bats.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:****Respondent Number:** 4767 **Comment Number:** 1 **Respondent Name:** Mark Funnell **Respondent Organisation:** National Trust**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Comment on multiple Strategic Sites**Comment made on the Proposed Change:**Support: 

The National Trust understands that the detail for the five strategic sites is to be taken out of the Placemaking Plan and moved into the Core Strategy. In respect of development sites, the National Trust made the following comment in the Placemaking Plan consultation: "New development proposed for the development sites in and around the City of Bath should respect the historic character and appearance of the World Heritage Site and should not have an adverse effect on the green setting of the city". We therefore ask that the same comment is also taken into account in respect of the Core Strategy.

**Change to the policy requested:****Respondent Number:** 4847 **Comment Number:** 1 **Respondent Name:** Richard Nash **Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

To allow areas of South Stoke to be taken out of green belt,when not proposing that a scruffy 8 acre green belt site in Manor Road, Saltford,can be taken out,where there is a proven need for housing is a total nonsense !. In the name of all that is sane,fair and reasonable,you guys really must get your act together and see the sense, that to agree to the development of the Manor Road site should go ahead.The time has come to take this small area of land out of green belt,as it should never had been made such in the first place,you know that,just as the 300 to 500 long term residents of Saltford know it. They are the people who clearly stated in our recent Parish Plan that they wished to move to either cheaper or smaller properties in Saltford,as well as the sons and daughters of Saltford wanting first time affordable housing that the developers have promised for this site.Please take this into consideration for your core strategy.

**Change to the policy requested:****Respondent Number:** 4897 **Comment Number:** 1 **Respondent Name:** Richard Perrett **Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

I oppose the selection of the odd down / southstoke greenbelt site for development due to the following reasons -

- \*Loss of protected GreenBelt land.
- \*Impact to wildlife and landscape and an area of outstanding beauty.
- \*The Impact this will have on our local countryside and our quality of life.
- \*Loss of accessibility to the countryside and rural public footpaths.
- \*The impact of extra vehicular traffic in an already congested area,
- \*The potential for loss of value to our houses due to new development spoiling the location / view and reducing desirability of our greenbelt location.

**Change to the policy requested:**

I am requesting consideration that the odd down / southstoke site be ruled out and removed as a suitable location for further development and other sites not consisting of Greenbelt land be considered instead.

**Respondent Number:** 4913 **Comment Number:** 1 **Respondent Name:** Mr. Stefan Perkins

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

I like many residents of Bath am totally against the building on our Green Belt and as I live on Combe Down I have a particular interest in the Council's Core strategy. When we intend building up to 700 homes on the MOD site how on earth is it justified to build another 300 plus properties on the Sulis meadows site? Such a massive amount of new housing in a confined area in one bit of Bath is insane. The traffic issues already being experienced along Bradford Road, Rush Hill, the A367 and Frome road are already beyond a joke as the Wessex Water site and also the University site have grown and more and more cars are now on the roads.

Bath cannot sustain more and more development and at some stage we must accept a saturation point.

There have been very little increases in job opportunities and if we allow Bath to continue to be a commuter belt for Bristol and London it will grind to a halt, just like Bristol is doing at this very moment.

Bath is a beautiful city and to build further on Green belt is totally unacceptable. Two or more years ago Sainsbury's built their store at Frome Road and part of the planning was that some residential properties for the elderly would be built on the site. Not a clod of earth has been turned to start this. This is a BROWNFIELD site so why have we not allowed this to be developed as a matter of urgency. In fact the planning agreed here should be altered to allow more building on the site, for example low level flats which can incorporate homes for the elderly plus homes for young first time buyers. It is outrageous that this piece of land lies empty yet the Council are suggesting building on green belt land.

I have a cynical suspicion that this land will not be built upon, the planning will run out, Sainsbury's will buy themselves into this land and extend their empire at the site, maybe a petrol station or increase the size of their store,

I love the City that I was born in and will not stand by to see it overbuilt and destroyed (and over populated). What density of housing is being proposed for the Warminster Road MOD site and the Lansdown site. I expect as the richer members of our city live in these areas we will see minimum house building! I sincereluy hope that you together with all Councillors who really care about Bath will oppose this wrecking of a beautiful city.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:****Respondent Number:** 4928 **Comment Number:** 1 **Respondent Name:** Jean Biggs  
**Agent ID:** **Agent Name:****Respondent Organisation:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:****Support:** 

I object to your plans to develop the green fields at Odd Down & South Stoke – as this directly conflicts with aims of AONB – in which my husband served for over 30 years as a voluntary warden. There is no justification to ‘grab’ so much of the AONB to build 300 homes!

**Change to the policy requested:**

Abandon all proposals that remove land from Green Belt and AONB.

**Respondent Number:** 4930 **Comment Number:** 1 **Respondent Name:** Ruth Newman  
**Agent ID:** **Agent Name:****Respondent Organisation:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:****Support:** 

Taking this green belt and using AONB is not necessary. The land being taken would be of low density & there is not exceptional need to make the change. The law would be flouted. Unesco require a buffer zone this change would leave none.

**Change to the policy requested:**

BANES should use all brown field sites prior to Green Belt, it is a heritage site and should not be interfered with.

Increase the density on alternative sights in the city, including using a large number of empty flats above shops etc. There are empty properties everywhere.

Support Bat nesting and forage sites.

**Respondent Number:** 4931 **Comment Number:** 1 **Respondent Name:** Tim Conroy  
**Agent ID:** **Agent Name:****Respondent Organisation:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

There is a basic problem with the plan and that is Greenbelt land is there for a purpose – to stop the expansion of the city – and this should be preserved at all costs. Already Sulis Meadows has been built on the greenbelt so there are 300 houses already that shouldn't be there. This development makes 600 houses too many. No greenbelt land around Bath should be considered at all. We should not be continually expanding the city.

This is not NIMBYism but NOOGism – Not On Our Greenbelt.

**Change to the policy requested:**

Bath's Greenbelt should not be built on at all, either in Odd Down or Weston. New housing, if not on brownfield sites, should be built in other parts of BANES. Other centres in BANES should be grown as a strategy and stop Bath overheating.

**Respondent Number:** 4935 **Comment Number:** 1 **Respondent Name:** Mr Darryl Sibson

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**Support: 

I object to the removal of land from the Green belt and the invasion of the natural habitat of the protected bat population in the proposed development area.

I also object to the proposal of providing addition vehicular access to the site and the consequential additional traffic in the already congested roads. I request to see any surveys or supporting studies done to verify the surrounding road network are capable of supporting a potential extra 300-400 vehicles during peak traffic times.

**Change to the policy requested:**

I request that the proposal to remove land from the Green belt and the future development for housing be withdrawn.

**Respondent Number:** 4936 **Comment Number:** 1 **Respondent Name:** Dr Diana Price

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**Support: 

With respect to moving the boundary of the Green Belt at Odd Down

- The area is of outstanding natural beauty
- The area is of special scientific interest
- The area contains a part of the Wansdyke which is one of the best examples of a possibly 5th Century Scheduled Ancient Monument in this country

Moving the Green Belt boundary will mean that all this land will be built on – it will disappear under housing estates! And the village of Southstoke will become merely another suburb of Bath.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4938 **Comment Number:** 1 **Respondent Name:** Rosemary Geake**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

QUESTION 1. How does the Council justify the use of misappropriation of land which is currently protected?

The purpose of the laws that restrict house-building is to preserve the rural spaces between towns and cities, and greenbelt encircling built-up areas. The most precious and irreplaceable of these are the SSSIs, AONBs and sites of historical interest. The South Stoke plateau land is designated as an Area Of Natural Beauty, Green Belt, the Environs of a World Heritage Site, and a Site of Historical Interest as the Wansdyke Ancient Monument runs close by.

QUESTION 2. Have our present resources been responsibly used up?

- existing unused buildings,
- city infill and derelict land within the city,
- domestic dwellings above shops and business premises (which incidentally would be good for the city centre because it would be lived in and therefore more secure),
- a few more houses within the infill spaces of outlying villages.

If new-build is allowed while there are still resources for refurbishment and regeneration in the city

- not forgetting small-scale infill within our villages - our countryside will dwindle, going relentlessly under concrete - new estate by new estate. The green belt was not drawn up lightly and should not be abandoned lightly without using present resources first. To infringe on precious rural and wild countryside while leaving these resources unused is irresponsible in the extreme.

QUESTION 3. Is the Council under too much pressure from big building corporations?

Unfortunately, using up existing areas for building before resorting to these desperate measures obviously does not appeal to big building firms, as brown field building is more expensive and less straightforward. However, cheap-minded and indefensible excuses for spoiling Britain's countryside, where money is the only factor being considered, are intolerable.

Considering the huge cost to present and future generations of despoiling our land in the way being proposed, it is extraordinary that the Council is even considering flouting the law in this way, or giving in to the bully-boy building firms (if this is what they are doing), who stand to gain (money) at everyone else's expense (in well-being).

Value must not be assessed in money terms only. We should consider ('spending of countryside' as well as spending of money: and (unlike money) there isn't any more where that came from! Of course, there is a powerful argument that in these straitened times there is no money for implementing responsible planning. But money is usually found when there is a pressing need. Do we really want to spend our valuable countryside? Our children will not thank us.

Other values besides monetary and economic ones are just as important for the well-being of society, and to neglect these is to invite long-term problems - problems which may be less identifiable but must be taken into account in planning for the future.

Obviously we need more houses. But not in the wrong places. Good rarely comes from doing bad things.

Please, please do not build on this wonderful plateau.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4939 **Comment Number:** 1 **Respondent Name:** Sarah Fawcsett**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

Below are the points I would like to raise with the Planning Policy Team as you consider the proposed plans for South Stoke Plateau:-

1. If Bath's World Heritage Site status is dependant on having a buffer zone then the proposed plans will presumably risk the city losing that status. It was BANES that argued there was no need for a buffer zone because the Green Belt and Area of Outstanding Natural Beauty provided one and now you are considering destroying a section of that zone. Not only that but the development will be adjacent to the Wansdyke- these plans contravene the National Planning Policy Framework because there are no 'exceptional or wholly exceptional' circumstances to be taken into account. (Ref: NPFF Clause 79 - 88). It is also important that South Stoke Conservation Area is protected against development and those areas on the concept map that might affect it should remain in the Green Belt. (See CSA22/6 p19 and ref NPFF Clause 132)

2. If the density of building at Sulis Meadows is a good example of modern development then the area enclosed by the proposed new Green Belt Boundaries will enable 650 -700 houses to be built. The implication of this information seems to me to mean one of two outcomes. Either 300 affordable houses are built and then the developers apply to build a whole lot more expensive houses which will bolster their profits or 300 affordable houses are built and then at some later date application is made to build another 300 to 400. If it is 300 we need why take so much land and destroy so much of the Green Belt and Area of Outstanding Natural Beauty? (See BANES ref: CSA22 and their Green Belt diagram CSA23 (Annex 1 page 570))

3. The idea that there should be an access road leading into South Stoke Lane seems ludicrous in the extreme given the amount of traffic that would be travelling to and fro and the size of the lane which is barely more than single track. And, in fact, the general increase in traffic wherever the access is from would put a severe strain on what are already overloaded roads, frequently at a standstill during the rush hour both morning and evening. (BANES ref: CSA22/7 p21)

Apart from the points I have made above I would like to add my personal opinion of this proposed development as well as house building in general. I understand and accept that we need to build affordable houses and realize how lucky I am to have one. But I think before the Green Belt and Areas of Outstanding Natural Beauty are built upon and destroyed for ever making it a longer trip for those in the middle of the city to get to the green spaces and making the boundaries between city and country ever less defined we should be developing the brown field sites. We have the MOD sites, we have the Bath Press Site which is a good sized area and which should be used for affordable housing not for another supermarket, we have various large empty office blocks in the city, we have other spaces on the western side of the city that could be developed. Surely every effort should be made to recycle land which has already been built on for one reason or another before we even consider an area as special as South Stoke Plateau with its larks and bats and views and peace and quiet which is an easily walkable distance for anyone with the inclination living on the south side of Bath.

**Change to the policy requested:****Respondent Number:** 4940 **Comment Number:** 1 **Respondent Name:** David Fielden**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

I write as a resident of South Stoke and am most concerned with the proposal to remove the majority of the plateau land from the Green Belt leaving only the small field between the Brantwood footpath (Ref BA22/2) and South Stoke Lane.

I understand that the area enclosed by the proposed new Green Belt Boundaries is sufficient for between 650 and 700 houses at "Sullis Meadows "density. If it is found that 300 dwellings are needed then why take so much land? Surely that guarantees a much larger development eventually . (see BANES ref: CSA22 and their "Green Belt diagram CSA23 (annex 1page 570)

Additionally the shaded area around Manor Farm buildings seems to imply development for "Employment purposes", This is entirely within the Green Belt and subject to the rules set out in the NPPF (clause 89). Their present uses have planning permission but any further changes or intensification of that use in this prominent position on the edge of the Plateau would be seriously detrimental to the Green Belt AONB, World Heritage Site and the stunning setting of the Millenium Viewpoint. See CXA 22/6 pages 21 and 22).

**Change to the policy requested:**

<b>Respondent Number:</b>	4941	<b>Comment Number:</b>	1	<b>Respondent Name:</b>	Michael & Beatrice Godwin	<b>Respondent Organisation:</b>	
<b>Agent ID:</b>		<b>Agent Name:</b>			Michael and Beatrice Godwin		

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

We wish to protest about the planned building of 300 houses on the Green Belt, the Area of Outstanding Natural Beauty at South Stoke Plateau, adjacent to the Wansdyke scheduled ancient monument. The National Planning Policy Framework (published March 2012) recommends that such development should only take place in "wholly exceptional" circumstances (para 132).

Bath is surely a wholly exceptional case: it has been designated as UNESCO World Heritage Site (WHS) surrounded by irreplaceable ecological assets. Landscape protection is both a UK government national requirement and a UNESCO international requirement - the rural setting of the World Heritage Site is an essential part of the UNESCO listing. The area has been part of the Cotswold Area of Outstanding Natural Beauty since the Cotswolds Area of Outstanding Natural Beauty (Designation) Variation Order 1989 was confirmed by the Secretary of State on 21 December 1990.

The underlying oolitic limestone of the plateau makes it physically, topographically and geologically part of the Cotswolds. The impact on views in and views out of the Conservation Area would have a disastrous effect on the setting of the World Heritage Site. We find it hard to believe that adequate measures could be taken to reduce the visual impact on a development of this size.

The plan completely ignores the UNESCO recommendation that there should be a clear Buffer Zone of unspoilt countryside between the World Heritage City of Bath and the surrounding villages – at one point (labelled 'Potential Access from South Stoke Lane') the plan envisages the City of Bath encroaching to no more than 100 yards from the village of South Stoke. The council's argument that a Buffer Zone is unnecessary because the land is protected by the Green Belt and AONB is absurd if this 'protection' can be overridden simply by rewriting the local plan. South Stoke is a unique community in a rural area; a development which envisages high-density housing would ruin the special quality of the village. This encroachment would virtually swallow the separate conservation village of South Stoke and digest it as a

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

suburb of Bath.

The area around the village of South Stoke currently benefits from glorious dark skies which will be invisible in the glare of street lights. The plateau is a haven and foraging area for skylarks (Schedule of Core Strategy Amendments, 11 November 2013, p18) and greater horseshoe bats, which are an endangered species (Schedule of Core Strategy Amendments, 11 November 2013, p25) and other wildlife. It is hard to believe that the noise and light from a 300 house building development would not frighten away these increasingly threatened birds and mammals which are protected under the European Convention on Rare Species.

The Wansdyke scheduled ancient monument has been a boundary marker since the Angles and Saxons invaded in the 6th and 7th Centuries – the section adjoining Midford Road <http://list.english-heritage.org.uk/resultsingle.aspx?uid=1007003> has been allowed to deteriorate, but is still a clear dividing ditch between the urbanised city and the countryside which ought to be restored sensitively, rather than built over.

Transport links to the area are quite limited; we have lived at Malvern House, 152 Midford Road for more than 12 years, during which the volume of traffic on the B3110 has increased vastly in volume, particularly after 2008 closure of the A36 – and we read this week that there will be yet another long closure of the A36 in 2014, which will inevitably lead to more traffic clogging up the B3110. There is a weight limit on the B3110 which would also restrict access to the proposed development.

If South Stoke Lane becomes an access point for 300 new houses the amount of traffic on the B3110 is bound to increase substantially, to the detriment of the local environment. (Schedule of Core Strategy Amendments, 11 November 2013, p21-22). South Stoke Lane would have its character changed to become another busy B road with white lines and street lighting. The junction at the Cross Keys is liable to become an accident-prone bottleneck like the dual mini-roundabout at the junction of Midford Road and Bradford Road. Even the other envisaged access point from the A367 is quite restricted as the A367 is single carriageway on the south side of the Red Lion roundabout.

The policy of the council has long been to give priority to developing brownfield land before considering greenfield sites (e.g. 1998 Structure Plan; PR 565, 15 Jan 2002). An interview with David Batho in the Bath Chronicle (p5, 28th November 2013) states that the required number of houses has been overstated by 4,200: “It is demonstrably clear that B&NES housing needs can be met without building a single house in the green belt”. That is our view, too.

**Change to the policy requested:**

**Respondent Number:** 4941 **Comment Number:** 2 **Respondent Name:** Mr Michael Godwin

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Concerned about increase in traffic along Southstoke Lane;  
Eroding of separation between South Stoke village and city of Bath;  
Damage to Wansdyke ancient monument;  
Disturbance to wildlife including skylarks, rare horseshoe bats and deer;  
Principle of AONB is being breached – thin end of the wedge .

**Change to the policy requested:**

Policy B3A placemaking principles

1. There should be no building on AONB or Green Belt land

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

5. Ecological requirements including skylark and protected bat species will be severely eroded by building 300 houses in this area

7. Transport along Midford Road has increased dramatically since 2000. New building will only aggravate the overloading of a B-Road. Upgrading of the Cross Keys junction would also be very disrupting, and (if it is like the dual mini-roundabout at the Glasshouse) potentially an accident blackspot.

**Respondent Number:** 4943 **Comment Number:** 1 **Respondent Name:** Stefan Perkins

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

This plan is unnecessary and will create additional problems to local infrastructure ie roads / demands on services. 700 homes are to be built on the Foxhill MOD site which is nearby. A second large development is too much for one side of Bath.

The local roads are full to capacity already during peak times, in fact queues along Bradford Road, Frome Road, Rush Hill, Wellsway are horrendous. The building of homes at the MOD is more than enough for this side of Bath.

The encroachment upon South Stoke village and the loss of Green Belt land is unacceptable. South Stoke will be swallowed up with Odd Down and lose its uniqueness as a village on the edge of Bath.

At some time there needs to be the admission that Bath has reached saturation point. This time is NOW. Bath's unique UNESCO status is under threat.

**Change to the policy requested:**

1. Abandon extending the Sulis Meadows Estate  
2. Use existing brownfield sites – convert the Park and Ride into housing, compulsory purchase Fullers Earth and convert to a new Park & Ride. The only issue with this is again the increase in traffic.

There are other areas to build:

1. Land near to Sainsbury's, Frome Road, earmarked for homes for the elderly – we are still waiting for development years later, yet Sainsbury's are OK (thank you very much).  
2. Land adjacent to the A4 at Twerton – both sides of the road (before large traffic light junction at Twerton fork).  
3. Convert the whole of the Old Printworks (Blackett Press) to housing. (On A4 between Brougham Hayes and Windsor Bridge). Do NOT allow Tesco to use the site.  
4. Do something about the buy to let situation to free up housing.

**Respondent Number:** 4944 **Comment Number:** 1 **Respondent Name:** Keith Franklin

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-  
 -GREEN BELT/AONB : (ref NPFF Clause 79 to 88.)  
 (Insert reasons for objections in your own words)  
 There are plenty of brown field sites that can be utilised first. The Green Belt is for future generations to enjoy not ours to destroy.

-DEVELOPMENT PLAN: (see BANES refCSA22 and their Green Belt diagram CSA23 Annex 1 page 570) (why is it necessary to remove so much land from the Green Belt)  
 (Insert reasons for objections in your own words)  
 Removal of any Green Belt is wrong when there is alternatives. This land is for the enjoyment of all not the profit of a few. Use brown field sites.

-SITE ACCESS AND TRANSPORT: BANES refCSA 2217 p21  
 (Insert reasons for objections in your own words)  
 I have 3 children that would be at risk by higher traffic volumes. With 3 schools in the vicinity children are put at risk. The new development will bring in heavy JCB & wagons during construction that will be an extra risk to residence & residents.

-WORLD HERITAGE SITE BUFFER ZONE (Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it. BANES have long said that the green belt protects it. Now it plans to remove this protection.  
 (Insert reasons for objections in your own words)  
 Tourism is the city's biggest industry. People love the proximity to the country side + historical monument this plan threatens both

-HERITAGE ASSETS: CSA 22/6p19 refNPFF Clause 132 (moving the boundary/ protecting the Wansdyke, a national monument that runs through from St Gregory's school to the Cross Keys Pub)  
 (Insert reasons for objections in your own words)  
 Destroying history, damages/omits our future only by learning about our past can we avoid mistakes they made. It also means that our children cannot visualise other lifestyles that peoples had n our country's past

-ECOLOGY/WILDLIFE refCSA22/5 p18 (the area is used as a foraging area for an endangered species e.g. Horseshoe bat. They use the trees, but would be hindered by light and noise of any development. The skylark, also endangered, uses the area as a breeding ground. Dark skies are fundamental to retain the beauty of this landscape. Mitigation of these issues is not possible.  
 (Insert reasons for objections in your own words)  
 At a time when every species of bat and bird is under attack we should do all we can to protect them building on brown field sites will lessen the impact on these endangered animals. In addition light pollution will make it harder for me to take my daughter star gazing.

P.S. I earnestly pray that the fields here are not built on.

**Change to the policy requested:****Respondent Number:** 4945 **Comment Number:** 1 **Respondent Name:** Mark Minkler**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-  
 -GREEN BELT/AONB : (ref NPFF Clause 79 to 88.)  
 (Insert reasons for objections in your own words)  
 This protection of Green Belt should not be disregarded as 'Brownfield' sites exist as an alternative and Green Belt loss is irreversible.

-DEVELOPMENT PLAN: (see BANES refCSA22 and their Green Belt diagram CSA23 Annex 1 page 570) (why is it necessary to remove so much land from the Green Belt)  
 (Insert reasons for objections in your own words)  
 The council is failing to exercise proper judgment in proposing to build on Green Belt land.

-SITE ACCESS AND TRANSPORT: BANES refCSA 2217 p21  
 (Insert reasons for objections in your own words)  
 Increasing traffic around Sulis Meadows endangers children.

-WORLD HERITAGE SITE BUFFER ZONE (Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it. BANES have long said that the green belt protects it. Now it plans to remove this protection.)  
 (Insert reasons for objections in your own words)  
 Removing Green Belt status is a blatant dereliction of the council duty and must not be allowed.

-HERITAGE ASSETS: CSA 22/6p19 refNPFF Clause 132 (moving the boundary/ protecting the Wansdyke, a national monument that runs through from St Gregory's school to the Cross Keys Pub)  
 (Insert reasons for objections in your own words)  
 We cannot afford to lose national monuments. Once gone there is no replacement possible.

-ECOLOGY/WILDLIFE refCSA22/5 p18 (the area is used as a foraging area for an endangered species e.g. Horseshoe bat. They use the trees, but would be hindered by light and noise of any development. The skylark, also endangered, uses the area as a breeding ground. Dark skies are fundamental to retain the beauty of this landscape. Mitigation of these issues is not possible.)  
 (Insert reasons for objections in your own words)  
 Loss of ecology and wildlife is unnecessary as suitable 'brown field' sites exist as an alternative.

**Change to the policy requested:**

**Respondent Number:** 4946  
**Comment Number:** 1  
**Respondent Name:** Peter J Foster  
**Agent ID:**  
**Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-  
 -GREEN BELT/AONB: (ref NPFF Clause 79 to 88.)  
 This area will certainly not be an area of outstanding beauty if the area of the fields were to be built on. The unique beauty of Bath is the hills and fields surrounding the City. A fact that many visitors remark upon. The AONB status will have to be revoked. Also, will it legitimately be entitled to use the status of Green Belt? The area will be ruined for all time.

-SITE ACCESS AND TRANSPORT: BANES ref CSA 22/7 p21  
 Sulis Meadows is already over congested. There are already many 'near-misses' making it even more treacherous given

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

the fact that there are children playing in the street (I live on Sulis meadows.) There is no way we could accommodate a 100 or so further cars, plus lorries, vans etc. There will need to be a major configuration of access into a new housing development, thereby using up more Green Belt land needed to accommodate large vehicles, car parking, services etc.

-WORLD HERITAGE SITE BUFFER ZONE (Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it. BANES have long said that the green belt protects it. Now it plans to remove this protection. Surely this would be illegal to remove this protection - certainly very destructive and short-sighted! It will be lost forever. England will no longer have a World Heritage City.

-HERITAGE ASSETS: CSA 22/6p19 refNPFF Clause 132 (moving the boundary/ protecting the Wansdyke, a national monument that runs through from St Gregory's school to the Cross Keys Pub)  
Again it will be an Asset lost forever! Surely we are not that desperate.

-ECOLOGY/WILDLIFE refCSA22/5 pl8 (the area is used as a foraging area for an endangered species e.g. Horseshoe bat. They use the trees, but would be hindered by light and noise of any development. The skylark, also endangered, uses the area as a breeding ground. Dark skies are fundamental to retain the beauty of this landscape. Mitigation of these issues is not possible.  
Again, once this lost, it is lost forever! Further Assets lost!

**Change to the policy requested:**

**Respondent Number:** 4947 **Comment Number:** 1 **Respondent Name:** Penny Moore

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

Support:

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-

-GREEN BELT/AONB; (refNPFF Clause 79 to 88.)

This area of land is an area of great natural beauty and extremely valued by many people, walkers and nature lovers. It is a peaceful and incredibly valuable area of the countryside. It is an essential part of the Bath countryside and it is irreplaceable. It is heart rending that you would even consider building on this land and outrageous that you wish to build houses on the green belt that has been designated as being protected. It should continue to be protected and untouched by any human hand other than care and concern and natural management.

DEVELOPMENT PLAN (see BANES ref CSA22 and the Green Belt diagram CSA23 Annex 1 page 570)

It should not be necessary to remove so much land from the Green Belt. There are brown field sites in the city that can be used to build on and should be used before considering building on any green belt area: specially such an area of natural beauty.

SITE ACCESS AND TRANSPORT: BANES refCSA 22/7 p21

Building houses will increase cars in an already overloaded area. The site access will be on to a country road that cannot take any more traffic than it already has. The facilities in the area are not sufficient to take such a substantial increase in use. There will be increased traffic congestion and also pollution to the area which will damage current transport routes.

WORLD HERITAGE SITE BUFFER ZONE

Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it and the green belt should do this. This therefore must not be removed.

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It is imperative that the green belt is protected absolutely- there should be no danger ever of this being removed. The area demands that such a site be kept in its pristine state. I consider it a crime against humanity and the world we live in to consider removing it.

HERITAGE ASSETS: CSA 22/6 p19 refNPF Clause 132

The plans involve moving the boundary protecting the Wansdyke- I object to this as the boundary had already been set and agreed upon and is completely necessary to protect this area. Once you start to change these things it takes away the value and importance of the heritage site. It means that you disregard the importance of the site. The best plan would be to leave everything as it is.

ECOLOGY/WILDLIFE refCSA 22/5 p18

This is currently a protected area where endangered species find solace and an area that they can breed and be undisturbed. How can you possibly consider destroying such an area? The dark sky is essential to retain the natural beauty of this area. It is currently a place where I see so much wildlife and the wildlife is happy and free. We cannot take away another area where they dwell destroying their habitat. It is full of trees and rich ecological areas where multitudes of species exist.

Please hear our plea for this area and retain it and be proud that Bath has such an area. So many other cities have already destroyed or never had the privilege of caring for such a precious gem. The last thing we should do is build on it.

**Change to the policy requested:**

**Respondent Number:** 4949 **Comment Number:** 1 **Respondent Name:** Mrs Jennifer A Torrance

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I am very unhappy about some of the Core Strategy amendments. In particular with reference to the Green Belt / AONB on the South Stoke plateau.

Ref: CSA7, CSA10, CSA17, CSA20, CSA21 etc.

Building on the Green Belt & AONB, which form part of the setting of the World Heritage City of Bath, and is adjacent to the Wansdyke, contravenes even the latest National Planning policy framework. The Plateau forms a buffer zone for the City required by Unesco for a World Heritage site.

Even if 300 dwellings are really needed after using all the available brownfield and Admiralty sites, the area enclosed is far more than is necessary for that; and the proposed potential access road along the Brantwood northern boundary is totally unsuitable.

Ref: CSA22 Green Belt diagram, CSA23 annex & CSA 22/7 p.21.

I urge you to rethink the whole strategy which is inappropriate & very damaging.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

**Respondent Number:** 4951 **Comment Number:** 1 **Respondent Name:** Anthony C.F. Perry

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

Support:

I write concerning proposed development of the Green Belt site from Combe Hay Lane to South Stoke Lane. After living abroad for over a decade, I returned to the UK four years ago and live in rented accommodation in South Stoke. I have no vested interest in whether or not you build on the Green Belt - if you do, I can simply move - but see the amazing beauty of this place through a newcomer's eyes. What follows is not NIMBYism.

Rather, it is written in the interests of future residents, respectfully to ask that you do not sacrifice any part of the Green Belt to development. No convincing case has been made for the proposed development or that there are no alternatives.

Bath's building plan jeopardises its heritage and puts me in mind of Bracknell (Berkshire), where I lived for many years. Bracknell had been an unremarkable, but pretty, rural market town, but its destruction as such was wrought by social engineers and planners after its designation as a New Town, around 1948. The planners set about the vandalism of this pretty place with an arrogance that trammled over centuries of cultural evolution. The effect is a soul-less town - Bracknell - whose centre is an ugly and decaying concrete abomination that the children of today escape or use to push drugs. What a miserable legacy; its present residents are already seeking to expunge it. It evokes the spectre of your proposal for Bath.

However miserable the concreting of Bracknell was, WWII had at least provided a fig leaf of justification for its development: the re-housing of a displaced London population. What is Bath's justification for development? Bracknell had attracted a large clutch of national and multi-national companies, including 3M, Ferranti, British Aerospace, ICI and ICL, to name a few. What steps have the stewards of Bath's regional development policy taken to attract major employers over the past decades, so that (inter alia) new housing is justified?

Absent concerted employment expansion to support the influx of new people, your plans to build new homes are ruinous. But they are unnecessary in the first place. A conservative estimate of the number of empty properties in England is 710,000, of which 69,000 (about the size of Bracknell) are empty in the South West according to the most recent available data (1). The Communities Secretary, Eric Pickles, made it clear that we must make "...the most of every single square inch of brownfield land, every vacant home and every disused building..." (2). There are alternatives to building on the Green Belt.

Unlike Bracknell, Bath's infrastructure is grossly inadequate today even before any major new influx; narrow roads (they can't all be widened) used by heavy goods vehicles, buses and too many cars with no good link to major routes away from the city. Short distance journeys - commuting, for example - take ages. In fact the Bath travel network is a complete basket case and the City has made no preparations to warrant any expansion. Had the development plan been preceded by, for example, building a tram system into the City, it would have signaled seriousness about development. But Bath has no joined-up vision.

Bath needs a thoroughly-considered, coherent vision arrived at through broad and serious debate before any decision can be made about whether releasing Green Belt land makes strategic sense. But there is no convincing case that B&NES has laid the proper groundwork. Instead, the proposal looks like piecemeal profiteering that sells tomorrow down the river; developers will be long-gone when their reassurances are forgotten, their promises broken.

I therefore urge that you reject proposals to develop Green Belt land at the South Stoke plateau for the foreseeable future (it seems that otherwise development threats are merely repackaged and represented every time legitimate objections to them are upheld). This does not empty the options box for the more distant future, if Bath works hard to attract sustained inward business investment so that new development is warranted. Unfortunately, there are few signs of this today.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

**Respondent Number:** 4953 **Comment Number:** 1 **Respondent Name:** Emma Stroud

**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

Support:

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-

-GREEN BELT/AONB : (ref NPFF Clause 79 to 88.)  
(Insert reasons for objections in your own words)  
Removing land from Green Belt – especially AONB should only be done where exceptional circumstances can be demonstrated – I do not feel these circumstances have been shown to exist and therefore this land should remain Green Belt (ref NPFF Clause 79-88)

-DEVELOPMENT PLAN: (see BANES refCSA22 and their Green Belt diagram CSA23 Annex 1 page 570) (why is it necessary to remove so much land from the Green Belt)  
(Insert reasons for objections in your own words)  
Far greater amount land removed than required 300 homes – why – suggests future development.

-SITE ACCESS AND TRANSPORT: BANES refCSA 2217 p21  
(Insert reasons for objections in your own words)  
The potential access road to Southstoke Lane if established would require this single track lane being widened. How?

-WORLD HERITAGE SITE BUFFER ZONE (Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it. BANES have long said that the green belt protects it. Now it plans to remove this protection.  
(Insert reasons for objections in your own words)  
Surely this will put Bath’s WH status in jeopardy – this status plays large role in Bath’s tourist industry.

-HERITAGE ASSETS: CSA 22/6p19 refNPFF Clause 132 (moving the boundary/ protecting the Wansdyke, a national monument that runs through from St Gregory's school to the Cross Keys Pub)  
(Insert reasons for objections in your own words)  
This monument is already on Heritage at Risk Register – building 300 homes on the plateau would place it under greater threat.

-ECOLOGY/WILDLIFE refCSA22/5 p18 (the area is used as a foraging area for an endangered species e.g. Horseshoe bat. They use the trees, but would be hindered by light and noise of any development. The skylark, also endangered, uses the area as a breeding ground. Dark skies are fundamental to retain the beauty of this landscape. Mitigation of these issues is not possible.  
(Insert reasons for objections in your own words)  
Also see CD9/LV/1. – Zone of theoretical visibility for two storey buildings on this site would spread down to Combe Hay village.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 4954 **Comment** 1 **Respondent** Lucy MCSweeney**Number:****Number:****Name:****Respondent****Organisation:****Agent ID:****Agent Name:****Further Information available in the original comment?** **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

I am writing to express concern over the amendments to BANES Core Strategy.

I am very against the idea of building in the Green Belt. I believe that there are other sites which are not within the Green Belt, they may be smaller and more time consuming to identify but would cause less disruption to protected areas. I think it is vital that these sites are explored first.

I am particularly concerned about the idea of building in the Green Belt, AONB, setting of the World Heritage Site adjacent to the Wansdyke. This would contravene the National Planning Policy Framework. I cannot think of "exceptional circumstances" or "wholly exceptional circumstances" which would warrant BANES contravening the NPPF, (Clauses 79 to88) or in fact their own Policy B3a.

I also feel that BANES argument is lost regarding lack of the need to have a buffer zone around our World Heritage City of Bath because it is protected by Green Belt and the AONB if it is felt the status of these statutory protections can be ignored. The Planning team would use these statutory protections in cases where planning is applied for and refused by them so why are they not relevant to BANES in this case.

I am sure collaboration to find more suitable sites is a more sympathetic and proper way forward.

**Change to the policy requested:****Respondent** 4956 **Comment** 1 **Respondent** Mrs M Fry**Number:****Number:****Name:****Respondent****Organisation:****Agent ID:****Agent Name:****Further Information available in the original comment?** **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

The development plan shows the area enclosed by the new Green Belt Boundaries is sufficient for between 650 and 700 houses at "Sulis Meadows" density. If it is found that 300 dwellings are needed then why take so much more land? Is a much larger development eventually planned for this are of AONB.

Ref: CSA22

Ref: CSA23

If it is intended to use South Stoke Lane as a site access to the new development along Brantwoods' boundary, this lane is narrow and totally unsuitable for the increased traffic and larger vehicles from the new development.

If it is intended to further develop Manor Farm buildings for employment purposes, this would put an increased traffic flow on South Stoke Lane, which is already very busy with traffic from the village and Manor Farm employment already in existence.

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A new point of access would need to be from the west, adjacent to the Park and Ride. Ref: CSA 22/7, CSA 22/6.

The area is recognised as a foraging area for rare species of bat. They would be greatly disturbed by noise and light created by the new development. The area is a long established breeding ground for skylarks. Concreting over their nesting sites would cause serious harm and they would be lost forever. Ref CSA 22/5.

Building in the Green Belt, AONB, setting of the World Heritage site and adjacent to the Wansdyke is wrong and contravenes even the latest National Planning Policy Framework. Ref: NPFF Clause 79 to 88.

**Change to the policy requested:**

**Respondent Number:** 4960 **Comment Number:** 1 **Respondent Name:** Joan Schrecker

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

See my covering letter to Banes Planning Policy Team dated 15.12.2013

My very serious objections are

- 1.Loss of large portion of Green Belt
- 2.Encroachment on the Buffer Zone which is req by UNESCO World Heritage designation
- 3.Transport infrastructure as exists already very heavily used – more pollution / congestion
- 4.Sufficient sites (brown field, infill) already exist in the city for housing
- 5.Further degradation of Wansdyke National monument
- 6.Green Belt land important for leisure activities and are setting for the historic centre – all tourist attractions.

**Change to the policy requested:**

No extension into the Green Belt south of the city i.e. Southstoke Plateau.

**Respondent Number:** 4962 **Comment Number:** 1 **Respondent Name:** Barry W Maurice

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I have strong objections to the proposed changes to the Green Belt land adjacent to the WANSDYKE for the following reasons:

GREEN BELT / AONB: (ref NPFF Clause 79-88)

Building in the Green Belt / AONB / World Heritage Site and adjacent to the WANSDYKE is wrong and is a contravention of the latest National Planning Policy Framework unless “exceptional circumstances” can be proved to exist -- or, in the case of Heritage assets (such as Scheduled Ancient Monuments), “wholly exceptional circumstances” (Ref: NPFF Clause 79 - 88).

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****WORLD HERITAGE SITE BUFFER ZONE**

It has been long argued by BANES Council that a definition of this Buffer Zone is unnecessary because its setting is PROTECTED BY THE GREEN BELT. To set this protection aside so casually negates the notion of statutory protections and ignores the UNESCO REQUIREMENT for a Buffer Zone, based on Original Status date.

**HERITAGE ASSETS (BANES Ref: CSA 22/6 p.19 & NPFF Clause 132)**

In order to protect the WANSDYKE from development the area in front of it must remain in the Green Belt.

**DEVELOPMENT PLAN (BANES Ref: CSA 22 diagram CSA23)**

The new GREEN BELT BOUNDARIES are is sufficient for some 650 – 700 houses at “Sulis Meadows” density. If, as suggested, 300 properties are needed why the “need” for so much more land? Clearly, this underwrites an eventual expansion of development.

**SITE ACCESS & TRANSPORT (BANES Ref: CSA 22/7 p.21)**

The “potential access road”, shown on BANES map (diagram CSA23, Annex 1, p.570) , leading to the new development along “Brantwood’s” northern boundary to South Stoke Lane, is scarcely more than a single track and cannot cope with increased traffic. Thus, access would have to be from the WEST by the PARK & RIDE. Any access from the EAST would guarantee the spread of development over the whole plateau in the course of time. This is unacceptable. Indeed, if there were to be improvement at the CROSS KEYS junction it should only be to improve current safety NOT TO FACILITATE URBAN ENCROACHMENT of the plateau and the consequent traffic flow increase through South Stoke Village.

The City of Bath already has seemingly intractable problems with road traffic & to impose large scale development(s) on its southern boundaries will be seriously detrimental to its status as a WORLD HERITAGE CITY. The release of M.O.D. lands across the City for development purposes is more than adequate to protect this status and restrict the inevitable traffic gridlock growth will create.

**EMPLOYMENT FACTORS (NPFF Clause 89)**

From the BANES map, the shaded area around Manor Farm buildings seems to imply development for “EMPLOYMENT PURPOSES” . this area is entirely inside the Green Belt and subject to NPFF rules (clause 89). Planning permission exists for present uses, but any further changes would be SERIOUSLY DETRIMENTAL to the Green Belt, the AONB, the WORLD HERITAGE SITE & the splendid setting of the Millenium View Point. (CSA 22/6 p21 – 22).

**ECOLOGY & WILDLIFE (CSA 22/5)**

The area is acknowledged as a foraging area for a rare species of bat. It is also a long established breeding ground for skylarks.

A large housing and infrastructure development will threaten and / or destroy all these fundamental natural features of this precious landscape. Once gone – forever lost. And it is not possible to mitigate the impact – only to offer specious argument.

**Change to the policy requested:**

**Respondent Number:** 4964 **Comment Number:** 1 **Respondent Name:** Margaret Stroud

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

Support:

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-  
-GREEN BELT/AONB : (ref NPFF Clause 79 to 88.)

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All this land is in AONB – be definition land that is so outstanding in its character & beauty – how will building 300 homes safeguard this precious landscape.

-DEVELOPMENT PLAN: (see BANES ref CSA22 and their Green Belt diagram CSA23 Annex 1 page 570) (why is it necessary to remove so much land from the Green Belt)

The area marked to be removed from the Green Belt is far larger than the amount required for 300 houses (based on the density of housing at Sulis Meadows). By removing all this land the implication is that future development will take place in the future.

-SITE ACCESS AND TRANSPORT: BANES ref CSA 2217 p21

The potential access road to the new development to Southstoke Lane shown on map – this lane due to its narrowness would not be able to cope with increased traffic and any access from the east would mean inevitable urbanisation of the plateau overtime.

-WORLD HERITAGE SITE BUFFER ZONE (Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it. BANES have long said that the green belt protects it. Now it plans to remove this protection.

According to the circular on protection of world heritage sites (CD1/20) “protecting world heritage site and its setting includes any buffer zone from inappropriate development”. Since BANES considers the Green Belt & AONB around the City of Bath its buffer zone surely removing land from Green Belt & building 300 homes is in direct contradiction to protecting the buffer zone.

-HERITAGE ASSETS: CSA 22/6p19 ref NPFF Clause 132 (moving the boundary/ protecting the Wansdyke, a national monument that runs through from St Gregory's school to the Cross Keys Pub)

Building 300 homes on this land near to the Wansdyke will put this national monument at greater risk – the site is already on the heritage at Risk Register – The existing development at Sulis Manor has already caused extensive damage to it.

-ECOLOGY/WILDLIFE ref CSA22/5 p18 (the area is used as a foraging area for an endangered species e.g. Horseshoe bat. They use the trees, but would be hindered by light and noise of any development. The skylark, also endangered, uses the area as a breeding ground. Dark skies are fundamental to retain the beauty of this landscape. Mitigation of these issues is not possible.

CD9/E8 – Southstoke Plateau is a foraging area of the Greater Horseshoe bat – the survey states that “Horseshoe Bat populations are influenced by foraging quality. It is therefore important to safeguard/enhance these areas”. This will not happen if 300 houses are build in their foraging area.

Change to the policy requested:

**Respondent Number:** 4965 **Comment Number:** 1 **Respondent Name:** Sheila W Quinn

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I am writing to object strongly to proposed changes to the Green Belt at Southstoke plateau / Odd Down (ref CSA22 and CSA23)

This area is an AONB as well as being Green Belt. According to your placemaking principles (Policy B3A) ecological requirements require protection of dark skies to the south and east of location. How can this be achieved by building 300 homes with all the necessary street lighting. There is already light pollution in Combe Hay valley from Peasedown.

Returning to AONB & Green Belt – what exceptional circumstances have been demonstrated to require the need to

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

remove their land from Green Belt and the subsequent building of 300 homes – if not more in the future.

For ecological & historical reasons and Bath’s status of a world heritage site – this proposed amendment is a bad idea.

**Change to the policy requested:**

**Respondent Number:** 4981 **Comment Number:** 1 **Respondent Name:** Alison Ryan

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Odd Down/South Stoke

The site allocations in Odd Down/South Stoke should not be removed from the Green Belt and should not be allocated for housing development.

Firstly, the proposed development for housing will impact considerably on the traffic situation. Currently, during rush hour and even at other times, the traffic congestion along the A3062 is an ongoing problem. New housing will only increase the traffic to unmanageable limits, with potentially an extra 300-400 cars on the road. Even public transport (particularly the 20A Wessex bus service) is standing room only at peak times and is also subject to delays caused by the queues along the A3062. The roads in this area are not able to support the current traffic, let alone more.

Secondly, but no less important, the land is part of the protected Green Belt, which the local Government has a duty to protect.

The Government’s advice regarding the Greenbelt is especially relevant to the proposed site in Odd Down/South Stoke: “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

<http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/9-protecting-green-belt-land/>

The land has been granted Green Belt status for many reasons and should be retained as such. Part of the land contains the Wansdyke Scheduled Ancient Monument. Although the plans state that the actual Wansdyke itself would be protected, the character of this ancient site would be essentially destroyed permanently. The land is also a known feeding ground for the Greater Horseshoe Bat, one of the UK’s most rare species as well as a habitat for endangered skylarks and should be protected.

Finally, this beautiful area is enjoyed by local residents and visitors alike. It is within the Cotswold Area of Outstanding Natural Beauty and everything should be done to protect this site for future generations.

This site needs to be retained as Green Belt land and housing development plans for this area should be withdrawn.

**Change to the policy requested:**

I request that the proposal to remove land from the Green Belt and the future development of housing on this site should be withdrawn.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 4987 **Comment** 1 **Respondent** Naomi Price**Number:****Number:****Name:****Respondent****Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

I write with reference to the removal of Green Belt land involving Midford, South Stoke and Combe Hay.

As the area is part of an AONB, the Green Belt, and the Wandsdyke SAM, the application is unacceptable for several reasons.

Most obviously, it contravenes BANES' planning policy to say nothing of requirements imposed by national planning guidance, EU directives, the provisions of the Countryside and Rights of Way Act 2000 and the Town & Country Planning Act 1971.

BANES' planning policy has at its heart the conservation and enhancement of the countryside. It should reject this destructive application.

**Change to the policy requested:****Respondent** 4991 **Comment** 1 **Respondent** Claire Burge**Number:****Number:****Name:****Respondent****Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-

-GREEN BELT/AONB : (ref NPFF Clause 79 to 88.)

(Insert reasons for objections in your own words)

Loss of green fields to walk, exercise dogs, freedom for children to play and explore and to enjoy peace and quiet.

-DEVELOPMENT PLAN: (see BANES refCSA22 and their Green Belt diagram CSA23 Annex 1 page 570) (why is it necessary to remove so much land from the Green Belt)

(Insert reasons for objections in your own words)

The Council can build houses on other sites within the city. They do not need to build on these fields.

-SITE ACCESS AND TRANSPORT: BANES refCSA 2217 p21

(Insert reasons for objections in your own words)

The roads are already congested, building more houses in this area would make matters worse. Also Sulis Meadows could become a rat run at peak times putting school childrens lives in danger.

-WORLD HERITAGE SITE BUFFER ZONE (Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it. BANES have long said that the green belt protects it. Now it plans to remove this protection.

(Insert reasons for objections in your own words)

The green belt is needed to protect world heritage sites from the damage of urban sprawl and should not be removed.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

-HERITAGE ASSETS: CSA 22/6p19 refNPFF Clause 132 (moving the boundary/ protecting the Wansdyke, a national monument that runs through from St Gregory's school to the Cross Keys Pub)

(Insert reasons for objections in your own words)

I object to the boundary being moved, The Wansdyke is an ancient scheduled monument and should be protected

-ECOLOGY/WILDLIFE refCSA22/5 p18 (the area is used as a foraging area for an endangered species e.g. Horseshoe bat. They use the trees, but would be hindered by light and noise of any development. The skylark, also endangered, uses the area as a breeding ground. Dark skies are fundamental to retain the beauty of this landscape. Mitigation of these issues is not possible.

(Insert reasons for objections in your own words)

These fields are habitat to endangered species and therefore should be protected.

**Change to the policy requested:**

**Respondent Number:** 4997 **Comment Number:** 1 **Respondent Name:** William Stuart Mitchell

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

This comment applies equally to the small, medium, and large alternatives considered.

The area proposed to be declassified from green belt is currently also classified as an Area of Outstanding Natural Beauty, it includes a Scheduled Ancient Monument, an area classified as a World Heritage Site and boundaries the World Heritage Site.

If the proposal were to go ahead there would be a pocket of unclassified land between the World Heritage Site and the green belt which would therefore have very limited planning controls. With a skyline viewable from as far away as the Westbury White Horse.

The intent of the green belt classification was presumably to protect the setting of the World Heritage Site by preventing the unfettered growth of developments around it. There has been no change to this need.

The concept diagram highlights the desire line that there will be between any development and the superstore and admits that further harm will be caused to the Wansdyke scheduled ancient monument – the best outcome being to “avoid substantial harm”. While Bath is blessed with many heritage assets it is not appropriate to approach any of them with such a cavalier attitude.

The AONB classification re-enforces the special nature of the area. I have not searched myself for alternative development sites but cannot believe that there is nowhere with fewer existing constraints than the World Heritage, AONB, and Green Belt classifications which also contain a scheduled ancient monument.

**Change to the policy requested:**

Removal of the proposal to declassify the land at Odd Down from being green belt.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 4998 **Comment** 1 **Respondent** Beryl V Murray  
**Number:** **Number:** **Name:** Beryl V Murray**Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:****Support:** 

I am extremely Against Banes Core Strategy to build on the Green Belt, AONB, the World Heritage Site and so near the Wansdyke.

I have always understood that the World heritage City of Bath is protected by the Green Belt and the AONB.

For centuries the Northern boundary of South Stoke has been the Wansdyke, that should remain so for ever.

Paragraph 5 Access from the West adjacent to the Park & Ride. Not from the East would guarantee urban encroachment over the whole plateau.

Manor Farm buildings are within the Green Belt.

Present uses have planning permission but any more intensification on the edge of the plateau would be detrimental to the World Heritage site and the excellent setting of the Millenium Viewpoint.

**Change to the policy requested:****Respondent** 5006 **Comment** 1 **Respondent** George & Janet Carter  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:****Support:** 

We live in South Stoke and have done for very many years and are most upset about the proposal to practically remove all the plateau land from the existing Green Belt. It is completely wrong to build on the Green Belt, AONB, setting of the World Heritage Site adjacent to the Wansdyke. It contravenes the latest National Policy Framework unless exceptional circumstances can be proved to exist.

If the southern boundary remains undeveloped it should remain in the Green Belt. Additionally if the Wansdyke is to be protected from the development then the area in front of it must remain Green Belt.

If the South Stoke Conservation Area is to be protected against inappropriate development, any area on the concept diagram that may affect is should remain in the Green Belt. (see CSA 22/6 p19 and ref NPFF Clause 132).

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5007 **Comment Number:** 1 **Respondent Name:** Chloe Turner**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

Policy B3A (CSA 22) in the amended Core Strategy proposes the release of land at a site adjoining Odd Down (the “Southstoke Plateau”) from the Green Belt, a proposal that the National Planning Policy Framework (Ref NPFF Clause 79 to 88) permits only in “exceptional circumstances”, and in cases where a heritage asset such as the Wansdyke (as a “Scheduled Ancient Monument”) may be affected, in “wholly exceptional circumstances”. It is quite clear from the Core Strategy document that the circumstances here are neither “exceptional” nor “wholly exceptional”, and that the proposed release of land from the Green Belt is therefore in direct contravention of the National Planning Policy Framework.

The piece of land in question is not only in the Green Belt, of course. The Southstoke Plateau is within an Area of Outstanding Natural Beauty. It is adjacent to land within the South Stoke Conservation Area, it adjoins a Scheduled Ancient Monument as mentioned above, and should therefore enjoy the enhanced protection afforded by all of the above, making it all the more shocking that the proposal to release the land for development has even been contemplated. If the South Stoke Conservation Area is to be protected from inappropriate development, then any areas on the diagram at CSA23 that might affect it should remain in the Green Belt. If the Wansdyke is to be protected from development, the area in front of it needs to remain within the Green Belt.

The proposed site is also within the setting of the World Heritage Site of the city of Bath, being its southern boundary, and as such is required to be protected by the 1972 UNESCO World Heritage Convention, as signed by the UK in 1984. Releasing the land for development, and the inevitable urban creep that would result, would also be in contravention of that Convention, therefore.

Other, specific issues associated with the proposal outlined in the amended Core Strategy are:

-Why has land which could support 600 to 700 houses at “Sulis Meadows” density (as suggested at CSA22) been identified for release from the Green Belt when the same document suggests that 300 dwellings are required? Clearly releasing excess land will almost inevitably result in the excess being developed in due course.

-The “potential access road” to Southstoke Lane is barely more than a single track and therefore not suitable for increased traffic.

-The shaded area around Manor Farm Buildings is wholly within the Green Belt and therefore subject to the rules set out in the National Planning Policy Framework (clause 89), but the Core Strategy document seems to imply that this area might be available for development for “Employment Purposes” (beyond the existing uses, which have planning permission). Any such further development would be in contravention of the NPFF and seriously detrimental to the Green Belt, the AONB, the World Heritage Site and the setting of the Millennium Viewpoint.

All of the above clearly demonstrates that site adjoining Odd Down (the Southstoke Plateau) that has been identified for release from the Green Belt is wholly unsuitable for development, and to amend the boundary of the Green Belt in such a way would be in direct contravention of the NPFF, the 1972 UNESCO World Heritage Convention, and in violation of the protections afforded by the AONB, the South Stoke Conservation Area and the Scheduled Ancient Monuments legislation.

**Change to the policy requested:**

CSA 22 (Policy B3A) – the proposal to release land adjoining Odd Down for development as set out at CSA 22 in the amended Core Strategy Document should be wholly removed from the Core Strategy document, as this proposed change to the Green Belt is not legally sound and the Strategic Site allocated in this instance is wholly inappropriate for inclusion in the Core Strategy.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

**Respondent Number:** 5015 **Comment Number:** 1 **Respondent Name:** Jennifer John

**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

Support:

CSA22, CSA23 and CSA24

Swamping the Parish of South Stoke. I am totally against changing the Green Belt boundary in the South Stoke plateau area in order to allow an urban extension of Bath. All but the Odd Down Football Club and Sulis Manor lies within the parish of South Stoke. South Stoke's current housing stock is 177 homes and as an R3 village it should not be expected to take a further 300 homes.

Order of events. We are required to comment on where land will be removed from the Green Belt before the required housing numbers are fixed. This is surely the wrong order. The housing requirement should be fixed in advance of the decisions about release of Green Belt. This is critically important in relation to such a sensitive site. Once it is gone, the Green Belt is lost for ever.

Strategic Site Allocation. Employment. A particular area shaded buff colour over and north of Manor Farm buildings/trading estate on the concept diagram is within the Green Belt, and yet it is classed as a 'Strategic Site Allocation'. There is no key for this colour. CSA22.9 says 'The provision of additional local employment will be supported at Manor Farm, through conversion and redevelopment.' The outline of existing buildings is clearly visible and it covers half the site. Why is the other half of the site shaded, as it is obviously not going to be developed? This land was formerly the village cricket pitch. Council officers have told me that it will not be developed, and so it should not be coloured as part of the strategic site allocation. This change should not be accepted.

Excessive area to be removed from Green Belt. BANES claims to require 300 homes on this site, and yet it is proposing sufficient space for at least twice that number be removed from the Green Belt. (Arup 4.3 option 2) WHY? This is unjustified removal of exceptionally sensitive and highly protected virgin farmland from the Green Belt. This proposed change could be called 'unrestricted sprawl' as defined in NPPF 80 and reiterated in Summary of Stage 1 Appraisal 3.1.3.

Merging of Settlements. NPPF 80 further defines the purposes of the Green Belt 'to prevent neighbouring towns from merging'. This proposed intrusion into the Green Belt here will result in Bath coalescing with the rural village of South Stoke – a village with a Conservation Area at its heart. The eastern extremity of the proposed boundary is a mere 110 meters from the current South Stoke Conservation Area.

During the 'noughties' (i.e. 2000 – 2009), BANES invited South Stoke Parish Council to undertake a Conservation Area Appraisal. The process involved much careful assessment and reassessment – a dialogue between the Parish Council and BANES – leading to the final document being ready for adoption – a formality – in July 2011. BANES has since then consistently refused to/delayed/obstructed the completion of this adoption process, in spite of repeated requests. The current situation is that BANES has said that South Stoke Parish Council could pay for the work of formal adoption. Surely some weight ought to be given to this document? Had it been adopted by now, Brantwood, a gem of an Edwardian Arts and Crafts house set in grounds with many beautiful trees, would be within the South Stoke Conservation Area. This house and grounds would therefore abut the proposed Green Belt boundary, leaving no space between the proposed urban extension and employment site, and the Conservation Area. Surely a rural Conservation Area requires a rural setting to preserve its historic character? Another reason for not developing this plateau. This factor (the Conservation Area Appraisal) has been completely ignored by BANES in CSA22.6, and yet Sulis Manor, (a similarly attractive building with wonderful trees in its grounds – but which is not listed and not in a conservation area) merits a special mention! Brantwood ought to receive the protection it will have when the Conservation Area Appraisal is finally ratified. A gross omission by BANES, which has notably omitted to mark the Conservation Area boundaries on CSA23 and CSA24.

NPPF 80 The Green Belt exists to 'safeguard the countryside from encroachment'. This proposed boundary clearly violates that requirement. See CSA23 Concept diagram.

The Wansdyke. 'Wholly exceptional circumstances' (NPPF79 – 88) must be proven here for development to be permitted. A section of this bank and ditch Scheduled Ancient Monument runs due west from the Cross Keys junction to St Gregory's School. It had been the parish boundary of South Stoke for over 1,000 years (as defined in the charter dated 961AD) until St Gregory's School was built. An important historic landscape feature, it has been sadly neglected and abused by urban encroachment. BANES says 'Avoid substantial harm to the Wansdyke SAM', which almost implies that

some harm is acceptable! Furthermore, it ignores the SETTING of the Wansdyke, to which no reference is made – one of several significant omissions. When Sulis Meadows Estate was built, The Wansdyke's 'setting' was a token grassy strip – now cluttered with dog excrement and litter, with the backs of the adjacent houses turned on it resulting in a complete failure as a 'setting'. BANES has unceremoniously barged through the monument with insensitive concrete pathways without English Heritage's consent. Only a third of the original length of this stretch of The Wansdyke remains, with a precious but vulnerable setting worthy of a SAM. There is no question that this should be despoiled. It should remain in the setting of open downland as viewed from the Cross Keys end, with a single fine tree (and not with buildings) on the horizon. There are no plans to remedy any of the damage done in concreting over the SAM between Sulis Meadows and Fosse Gardens or Cranmore Place. A further unofficial crossing place has been badly eroded by general public use since Sainsbury's supermarket opened. There are plans in CSA23 here for an 'improved link' across The Wansdyke – this would be a further violation of the SAM. Two, three or even four wrongs do not make a right.

The Cotswolds Area of Outstanding Natural Beauty. NPPF 115 states that 'great weight should be given to conserving landscape and scenic beauty in ...AONBs, which have the highest status of protection in relation to landscape and scenic beauty.' These fields bounded by stone walls are typical Cotswold landscape. What justification could there be for contravening this stipulation on the South Stoke plateau? Yet another layer of protection on this very sensitive area. Where are the exceptional circumstances to justify removing this area from the Green Belt?

Ecology of the South Stoke plateau. The area is known to be a foraging area for horseshoe bats. A development of 300 homes with the accompanying infrastructure will not be conducive to their habitat, however much mitigation is attempted. Even worse will be the fate of the Skylarks, which give joy to the many people who walk this area: BANES claims it will 'safeguard skylark interests' (B3A.5), but this is patent nonsense. Skylarks' habitat is open downland, where they nest on the ground. That will be completely destroyed if these boundary changes are made. To safeguard their interests, the land should remain as it is. NPPF 115 'The conservation of wildlife and cultural heritage are important considerations in all these areas' (i.e. AONBs).

Local Amenity. Local people do genuinely appreciate this area of countryside – it is almost constantly in use by walkers and naturalists. People do need spiritual refreshment, and here it exists in spades and for free. Concreting it over would deprive a large number of people of this pleasure. It cannot be measured in numbers.

World Heritage Site Setting. UNESCO requires a buffer zone around its World Heritage Sites. Bath is the only entire city in the UK to enjoy this designation. BANES has rigidly refused to designate a buffer zone, claiming that the Green Belt performs that very function. If these changes are permitted, BANES will be destroying what it has defined as the buffer zone for Bath.

Views. The 'new link' from the proposed area of development to the Park and Ride is at the top of a triangular field in Combe Hay parish. This point is high and open and from it the views to the south are extensive, which means that whatever happens there will be seen from the south looking north from a great distance. Whether this 'link' is a road junction or a pedestrian bridge, it will certainly be lit, and therefore pollute the night skies.

Light Pollution. Although BANES refers to a 'tree belt' and 'limited light spill' in CSA22, these are just verbal attempts to 'mitigate' the seriously detrimental effects of these proposals. The word 'Mitigation' occurs four times and the phrase 'minimise harm' occurs six times – ten damaging facets of this flawed plan. Trees lose their leaves and so are ineffective as a light pollution barrier for part of the year. However much of an attempt is made to limit light spill, the fact is that the plateau will be visible from up to 15 miles to the south, and from an arc of 180 degrees. This is the extensive view that can be seen from the edge of the plateau, and so conversely can be seen from the south looking northwards. When Sulis Meadows estate was built, a condition was a belt of trees along the eastern edge to prevent light pollution. Though these were planted, they have since been drastically reduced in size at the residents' request, in order to prevent them from shading people's gardens! What is there to prevent a similar situation from occurring in future in respect of the tree belts along the south of the plateau? This would, of course, reduce their effectiveness in 'avoiding harm' to the WHS. What of the 'Dark Skies' policy?

Traffic. 300 homes will surely generate 300 cars travelling in and out of the area. The 'new link' feeds into the A367 and the roundabout at the Park and Ride. This confluence of traffic in rush hour is already at saturation point. Further congestion would lead to chaos here. A brownfield development of some 700 homes is planned at Foxhill. This will result in a further and unsustainable increase of traffic in the local area.

Potential Vehicle Access This route into a site would be disastrous for the Conservation Area. It is very well used at present with some 30 vehicles travelling daily into and out of the Trading estate at Manor Farm Buildings. Some make several journeys in to and out of the site each day. Southstoke Lane is a narrow lane, and vans or small lorries cannot pass without mounting the pavement. Were homes to be built on the eastern end of the plateau, and the orange lane used for access, Southstoke Lane would be totally inadequate. It is already extremely dangerous for residents coming in and out of their homes. Traffic increase here would also be detrimental to Brantwood, which is within the Conservation Area Appraisal, and its curtilage abuts the proposed area of development and the trading estate at Manor Farm buildings.

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BANES has carefully not marked the Conservation Area or the Appraisal Area on its Concept diagram – another significant omission. I hope the Inspector has access to maps with these Conservation Area boundaries marked on them.

BANES CSA22.6 'Development causing substantial harm to designated or non-designated heritage assets of demonstrably equivalent significance and/or their settings should be avoided.' In other words, ALL developments in this highly protected AONB, Green Belt, World Heritage Site Setting with The Wansdyke SAM and its Setting within the perimeter, should be stopped in its tracks. BANES ought to be protecting and defending its heritage assets instead of promoting their demise.

Alternatives. With the average household occupancy numbers reducing, more smaller homes (also known as 'affordable') are needed. Builders prefer to build market housing which generates more money for them. BANES has been weak in resisting pressure from builders to reduce the proportion of so called 'affordable' homes. If the proportion of 'affordable homes' was increased by about 3% in the brownfield sites such as the ex-MOD sites, there would be no need for this Green Belt land to be developed. At Foxhill, for example, only 30% of housing is to be affordable. Why not 40%, if this is the type of housing which is needed? The Inspector has the power to effect this.

Special Case. Bath is an unique city and this plateau land is a vital part of its setting, with many layers of protection. The whole character of Bath is at stake. Eric Pickles MP wrote on 26.3.2013 – 'Firstly, our reforms safeguard our glorious green spaces and countryside. They protect the green belt – that vital green lung that prevents urban sprawl. And they defend Areas of Outstanding Natural Beauty, and other important environmental designations.

Nothing will change that today. Nothing will change that tomorrow.'

The Minister's words indicate that development in these areas cannot be justified. Surely Bath should be a special case, and unless 'exceptional circumstances' exist, this land should not be released from the Green Belt. BANES makes no mention of 'exceptional circumstances' – on the contrary - it makes frequent references to the 'need to minimise the detrimental impact', 'minimise harm', 'ensure satisfactory compensation', 'protect', 'mitigate' and 'avoid harm', acknowledging the damage that will be done. All these phrases indicate that the damage caused significantly outweighs the need. Sir Andrew Motion writes –

'The English countryside is our great collective masterpiece – any development that needlessly damages it is an act of vandalism'.

Adam Fergusson (author of the prophetic 'The Sack of Bath') finished his lecture on 24.7.2013 at Bath Royal Literary and Scientific Institution with this challenging cry – 'Bath's Green Belt is NOT negotiable'.

### Change to the policy requested:

This policy CSA22 of removing Green Belt land at Odd Down/South Stoke is not compliant with NPPF. This area should not be removed from the Green Belt. The Core Strategy as amended by CSA22 would be Unsound.

**Respondent Number:** 5016 **Comment Number:** 1 **Respondent Name:** Valerie Summers

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

### Comment made on the Proposed Change:

**Support:**

Once again I find it necessary to protest, even more strongly, against the proposed Core Strategy Amendment. The new proposal gives little to the village of South Stoke as we retain only a minute section of the valued Green Belt and clearly leaves developers scope to build far more houses than presently estimated.

I would like to quote The Rt. Hon. Eric Pickles M.P. who in The Telegraph, March 26th 2013 says 'No one, including me, who loves our idyllic and precious English countryside wants to see the sword of Damocles hanging over it! He goes on to describe our Green Belt as a vital green lung, which prevents urban sprawl and promises that every inch of brownfield land and every vacant house and disused building will be made use of before the Green Belt is considered for development. This is definitely not happening in Bath, where there are 3 vacant ex- MOD sites waiting for development and numerous large empty blocks and derelict sites within the city boundary as well as the ex Purnell's factory site in Midsomer Norton where new development would be welcomed. Mr. Pickles promised to protect our Areas of Outstanding Natural Beauty and other important designations and says that nothing will change this promise today or

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tomorrow! What about our historic Wansdyke monument and the precious rare bat species and skylarks who breed on The Plateau? Do these creatures get any consideration?

Another major concern is the new proposed access point for traffic into South Stoke lane. This would certainly create chaos in an already very busy narrow lane, which is already suffering with a great deal of extra traffic generated by the recent development at the farm buildings here.

In South Stoke we certainly do feel the dreaded 'Sword of Damocles' hanging very closely over us! I declare this amendment to be unsound.

**Change to the policy requested:**

**Respondent Number:** 5024 **Comment Number:** 2 **Respondent Name:** Adrian Shields

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Green Belt/AONB

Building in the Green Belt , AONB , setting of the world heritage site and adjacent to the Wansdyke is wrong and contravenes even the latest National Planning Policy Framework unless 'exceptional circumstances' can be proved to exist, or in the case of Heritage assets ( Scheduled Ancient Monuments) "wholly exceptional circumstances"  
Reference CSA/7 . CSA/10 , CSA/17 , CSA/20 , CSA/21 , CSA / 22 and CSA/23 . BANES Policy B3a &NPFF clauses 79 - 88

**Change to the policy requested:**

**Respondent Number:** 5026 **Comment Number:** 1 **Respondent Name:** Alexander John

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

BANES ought to be defending the land at Odd Down/South Stoke and not putting it forward to be released from the Green Belt. This land is covered by five important layers of protection which ought to bar it from development.

- South Stoke Conservation Area. This important designation is omitted from the concept diagram CSA23. Why? Its current northern boundary runs very close to the South East corner of the proposed area of development. The Conservation Area Appraisal revised boundary actually runs alongside the orange line showing potential vehicle access. There is no provision on this diagram whatsoever for any Setting of the Conservation Area. This is a significant omission on the part of BANES. CSA 23.

- World Heritage Site Status. Bath is unique within UK as a WHS city in its entirety, and as such, should have a Buffer Zone. BANES has in the past declared that the Green Belt around Bath performs this function, and yet here it is shamelessly advocating the despoiling this protective space.

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- Cotswolds AONB. NPPF 115 states that 'great weight should be given to conserving ...AONBs, which have the highest status of protection in relation to landscape and scenic beauty.' Where are the 'exceptional circumstances' which justify this major development here? BANES does not mention any. Rather there are exceptional circumstances which make it essential that there is NO development here.
- Green Belt Status. NPPF 80's purposes would all be contravened were this area to be developed. Eric Pickles has said - "Our reforms safeguard our glorious green spaces and countryside. They protect the Green Belt - that vital green lung that prevents urban sprawl. And they defend Areas of Outstanding Natural Beauty, and other important environmental designations. Nothing will change that today. Nothing will change that tomorrow." (26.3.13.) It is difficult to see how development of this highly protected area could be justified in the light of this definitive statement of policy.
- The Wansdyke. A Scheduled Ancient Monument with its setting. NPPF 79-88. 'Wholly exceptional circumstances' have not been proven for justifying development to damage the SAM or its setting. CSA 22 refers to 'avoid substantial harm' - meaning that for BANES some harm is considered acceptable! BANES has not lived up to its duty to protect this heritage asset in the past, and it seems determined to be complicit in future 'harm' in terms of creating an improved link. This is unacceptable, as earlier comments from many archaeologists maintain.
- The Cross Keys Inn. This grade II listed building looks out across the Wansdyke and over an open Down at present. Were the development and the 'enhanced junction' to take place, inevitably this panorama would be sacrificed. BA22/5
- Traffic. Were development to take place here on the scale proposed (300 homes), or at a greater level (the proposed area is sufficient for double that), the area would be transformed from rural to urban. The roads could not cope! With 700 homes at nearby Foxhill, saturation point would be reached. The character of the area would be ruined and no longer merit any of the above special statuses. Can destruction on so many levels be justified and permitted in the name of 'development'? NO. There has to be a time to stop, and if space for the requisite number of homes cannot be found, BANES has to admit that, and defend its assets from wilful destruction.
- Alternative Solutions. Increasing densities slightly elsewhere of the number of smaller homes is important. Bringing forward sites in the ownership of BANES within the city to create more homes is essential. It has plans but they are 'for the future' - advance these plans eg for Avon St car park, and Manvers St car park. BANES has just given permission for student homes to be created at a Green Park site (former special needs centre) Why? Homes would have been more important. BANES needs to say 'NO' to more hotels, and push harder for a greater proportion of smaller unit dwellings to be built on every site available

**Change to the policy requested:**

For the above reasons, the Odd Down/ South Stoke plateau land should not be removed from the Green Belt, and should not be developed. These amendments make the Core Strategy UNSOUND.

**Respondent Number:** 5027 **Comment Number:** 1 **Respondent Name:** Alex Morris

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

This is an area of natural beauty and has many quaint idyllic elements to it. I believe that it would be a shame to build on this land when you could have a smaller projects in and around Bath that could be used on Waste land.

**Change to the policy requested:**

please do not remove the Odd down green belt.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5028 **Comment Number:** 2 **Respondent Name:** Alastair Gourley**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

The “wholly exceptional circumstances” required to move AONB boundaries are not proven.

This plan threatens the World Heritage Site; the claim that Bath does not need a buffer zone because it is protected by the Green Belt and AONB is erroneous as you are now proposing to change these boundaries and build there.

As a South Stoke resident, our community has fought really hard to maintain our individual identity over many years. The proposed development is 120m away from the South Stoke Conservation Area, and would damage the village’s individuality.

This would manifest it’s self in the widening and lighting of South Stoke Lane and the single track lane along Brantwood’s northern boundary. These lanes couldn’t cope with increased traffic, and so the development of them would lead to the perversion of our idyllic rural community. [CSA22/7]

There are approximately 370 houses on the Sulis Meadows estate. Yet the land proposed for development would hold about 700 at the same density. We are told that 300 more houses are needed here so why is so much land designated for building. [CSA22, CSA23]

Any further development for employment purposes around Manor Farm would seriously damage Green Belt, AONB, WHS and South Stoke Millennium Viewpoint. [CSA22/6].

**Change to the policy requested:**

Building on the Green Belt and the AONB will cause significant amounts of damage, outweighing the benefits of the development. The housing targets should be reduced and the development of the land adjoining Odd Down should be scrapped from the plans.

**Respondent Number:** 5032 **Comment Number:** 1 **Respondent Name:** Anne Ward**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

With reference to NPPF Ch 9, paras 79 , 80:

“The essential characteristics of green belts are their openness and their permanence” Key features are set out as:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict

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and other urban land.

It seems to me that the intention of parliament when setting out these aims is being ignored in the current proposal. The changes also denude an area designated an "Area of Outstanding Natural Beauty." Further, the proposed construction infringes upon the Wansdyke scheduled ancient monument.

I do not think the proposed incursion into the green belt as proposed could possibly be considered reasonable, proportionate or appropriate, nor does it appear to me to be consistent with national policy. It does not "protect green belt land, conserve and enhance the natural environment, or conserve and protect the historic environment" as stipulated in NPPF. It is hard to imagine a less suitable site for development given the specific historical, geographical and natural characteristics of this area. I understand the Council also relies on preservation of the green belt to "buffer" the city of Bath as a world heritage site and this scheme undermines its own position in this respect.

In conclusion it is my view that the core strategy cannot be legally compliant.

**Change to the policy requested:**

I wish for the area proposed for development to remain within the green belt.

**Respondent Number:** 5036 **Comment Number:** 1 **Respondent Name:** Charlotte Obolensky

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I have great concerns about the removal of land from the green belt, let alone AONB, the highest protection that land enjoys in the UK. My concerns are specifically:

That 'exceptional circumstances' needed to build on the green belt as laid down by the latest NPPF have not been proved in this case, or, in the case of Scheduled Ancient Monuments (the Wansdyke in this instance) 'wholly exceptional circumstances'.

That the Cotswold village of Southstoke should remain geographically separate from Bath, especially since it is itself a conservation area. The proposed development undermines this separation.

That Bath should not endanger its WHS designation by encroaching upon its southern boundary and its green bowl setting. Renewal of this status is not automatic.

The compromising of these basic principles in terms of land designation and WHS make the Core Strategy, in my view, unsound.

**Change to the policy requested:**

The change to the dangerous principle of releasing green belt land, let alone AONB land for development needs to be re-examined at source. The firm boundaries to our cities, towns and villages are one of these overcrowded island's crowning glories and a lasting reminder to the foresight of previous planners.

**Respondent Number:** 5038 **Comment Number:** 1 **Respondent Name:** Carolyn Bird

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Building in green belt, AONB, setting of the World Heritage Site and adjacent to the Wansdyke is wrong and contravenes even the latest National Planning Policy Framework. Ref CSA/7, CSA/10, CSA/17, CSA/20, CSA/21, CSA/22, CSA/23. BANES

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Policy B3a and NPFF 79-88.

**Change to the policy requested:****Respondent Number:** 5041 **Comment Number:** 2 **Respondent Name:** Ursula Brooke**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

TRANSPORT  
 NEW ROADS  
 SITE ACCESS  
 SULIS MEADOWS  
 SUGGESTED FURTHER DEVELOPMENTS

ref Banes CSA22/7 p21  
 NPFFClause 132

In relation to road plans it appears to me that the BANES Council are being blackmailed by the developers into allowing a rat run to develop between Sulis Meadows and the Cross Keys Pub junction via Southstoke Road. Though between a rock and a hard place (National Gov) BANES should stand proud of our heritage and firmly and refuse to allow money to win. It is not even plain that Southstoke plateau is indeed needed for housing at all. And Bath City streets and roads are already very overloaded with traffic.

**Change to the policy requested:****Respondent Number:** 5041 **Comment Number:** 1 **Respondent Name:** Ursula Brooke**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

WORLD HERITAGE .  
 GREEN BELT .  
 COTSWOLDS AONB.  
 SOUTHSTOKE VILLAGE is SEPARATE.  
 EUROPEAN PROTECTED BAT SPECIES AND THEIR HABITAT.  
 LIGHT SPILL.

ref NPFF Clauses 79 to 98. 132  
 CSA22/5  
 UNESCO buffer zone

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Banes and the National Government are failing to protect the vital green rim round Bath City. Some years ago I found in the village a group of Japanese Tourists gasping with joy at the view south from Southstoke. They were astonished that with their short trip by 13 bus and even shorter walk they'd got into beautiful green countryside. Never before had they experienced a city undepressed by a killing approach of house and industry.

Change to the policy requested:

**Respondent Number:** 5043 **Comment Number:** 1 **Respondent Name:** Suzanne Dawson

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The Odd Down/South Stoke site is inappropriate for development as:

1. It is a designated Area of Outstanding Natural Beauty and therefore subject to the highest level of protection from inappropriate development. B&NES council's assessment of housing need amounts to 5,437 market value homes + 3,290 affordable homes. However, the developers in discussion with the council are requesting the opportunity to build 9,646 market value homes in order to make sufficient profit to cover the cost of building the affordable homes. This means 4,200 market value homes, which are surplus to the council's stated requirements, are being proposed to support developers' businesses, and 300 of these surplus properties are being proposed for the Odd Down/South Stoke site, which as an AONB, should only be subject to development in "exceptional circumstances" according to the National Planning Policy Framework. Protecting developers' business goals does not constitute "exceptional circumstances" compelling the destruction of an AONB.
2. The site is not only an AONB, it is Green Belt land, and forms an essential part of the "Buffer Zone" required by UNESCO to protect the environment of Bath as a World Heritage Site. It also protects the Conservation Area of South Stoke from merging with Bath's urban perimeter and it adjoins The Wansdyke, which is a Scheduled Ancient Monument. All of these aspects require "exceptional circumstances", or even "wholly exceptional circumstances", to be present according to the NPPF, before development can proceed. B&NES Core Strategy Amendments have made no case for the existence of "exceptional circumstances" and the Core Strategy Amendments are therefore not consistent with national policy.
3. The site is an important foraging site for two species of rare bat, which are protected, as well as a nesting ground for skylarks. A development on this site will reduce available habitat and introduce noise and light pollution, making the site unattractive for existing and future wildlife. The effect of the proposed urbanisation of protected Green Belt land cannot be mitigated, and this habitat will be lost forever if the Green Belt status of this land is revoked.
4. The local road network cannot support the development of the Odd Down/South Stoke site. A vehicular access road is being proposed to channel traffic from the proposed development along South Stoke Lane to the junction at the B3110. However, South Stoke Lane is virtually single track, with pavement along one side and residential driveways opening straight on to it along the other. It is a road that already requires extra care by its users and to increase the level of traffic on it would be dangerous. Accommodating the proposed access route safely would this require taking extra land, which is currently shown as remaining in the Green Belt on the amendment map, and on which no consultation has been raised. This would have a seriously negative effect on the approach to South Stoke Conservation village, which depends on remaining separated from modern infrastructure for its historic character.
5. Bath currently has long-term unoccupied properties that need to be brought back into residential use, as well as a significant programme of large-scale projects to redevelop brown field sites, including the extensive redevelopment of the Fox Hill M.O.D. site just 10 minutes walk from the Odd Down/South Stoke site. It is entirely inappropriate to release an area of Green Belt land within an AONB for development, before these brown field development projects have been

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completed. If the Odd Down/South Stoke site is granted permission for development, it will be lost as a natural and historic asset forever, purely for the purpose of quick and easy profits for developers, and this cannot be permitted while the ongoing redevelopment of brown field sites offers long-term employment and business opportunities.

6.The Core Strategy Amendments are not sound because:

a.The proposal to allow development on the Odd Down/South Stoke site does not conform to the National Planning Policy Framework requirement that development of AONB/Green Belt/Heritage Asset sites is dependent on “Exceptional” or “Wholly Exceptional” circumstances.

B.The proposal is not justified, as the required number of new homes B&NES council have identified, can be easily accommodated without building on any Green Belt sites.

**Change to the policy requested:**

The proposal to permit development on the Odd Down/South Stoke site must be denied, as it is neither justified nor consistent with national policy.

**Respondent Number:** 5045 **Comment Number:** 1 **Respondent Name:** Suzanne Shaw

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Bath’s status as a World Heritage Site is valuable to the City and the people within it. I believe that the development as described on the Odd Down/Southstoke Plateau would fundamentally change the extraordinary setting that Bath enjoys. UNESCO require a buffer zone so that any World Heritage City can stand untainted by the suburban sprawl that surrounds most other cities.

The council has never felt the need to define a buffer zone for the City as it has been protected by the Green Belt and the AONB. By casting these aside, Bath’s future as a World Heritage Site is in jeopardy.

**Change to the policy requested:**

I request that the policy is adjusted to remove the proposed development within the AONB and Green Belt at Odd Down/Southstoke.

**Respondent Number:** 5046 **Comment Number:** 1 **Respondent Name:** John A Wright

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I write to raise the following objections to the Core Strategy Amendments made by Bath & NE Somerset Council:

The amendments fly in the face of all that a World Heritage City should be striving to achieve. The proposal to use the Southstoke Plateau for future development erodes the buffer zone and desecrates the Green Belt, as well as damaging any appreciation of the Wansdyke, a heritage asset. The plateau is not only part of the green belt, but is also an Area of Outstanding Natural Beauty.

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There appears to be no need to use this area for housing; the numbers projected for Bath could be accommodated within brownfield sites, e.g. Fox Hill, etc, if necessary with a marginally increased density. Proposed access routes are inadequate, and the increases in traffic in the Southern side of Bath when combined with that from Fox Hill will be wholly unable to cope. Bath traffic is already a disaster for residents.

In my view there are no wholly exceptional circumstances which justify these amendments destroying such an important site as the Southstoke Plateau. I therefore object most strongly to what would be a wanton destruction of part of Bath's heritage.

**Change to the policy requested:**

**Respondent Number:** 5050 **Comment Number:** 1 **Respondent Name:** Mr John Weikert **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The land proposed for development at Odd Down/South Stoke is protected by its designation as Green Belt and as an Area of Outstanding Natural Beauty, this defines its local and national importance. It should not be possible to remove this protection unless "exceptional circumstances" can be proved to exist, as stated by the National Planning Policy Framework. I do not believe the case for exceptional circumstances has been made and the proposed changes also appear excessive for 300 new houses.

**Change to the policy requested:**

I would like to see the proposed changes to the Green Belt around Odd Down/South Stoke dropped and more use should be made of brown field sites within the Bath area.

**Respondent Number:** 5051 **Comment Number:** 1 **Respondent Name:** Joanna M. Pavey **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-  
 -GREEN BELT/AONB : (ref NPFF Clause 79 to 88.)  
 (Insert reasons for objections in your own words)  
 It's an AONB which should be preserved as such. If it's lost we will then lose it for ever. Lets be proud that we have an AONB.

-DEVELOPMENT PLAN: (see BANES refCSA22 and their Green Belt diagram CSA23 Annex 1 page 570) (why is it necessary to remove so much land from the Green Belt)  
 (Insert reasons for objections in your own words)  
 Why on earth use Green Belt when there is plenty when there is plenty of Brown Field sites which can be improved if developed well.

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-SITE ACCESS AND TRANSPORT: BANES refCSA 2217 p21

(Insert reasons for objections in your own words)

The A367 is already one long constant traffic jam. Why add further to this congestion.

-WORLD HERITAGE SITE BUFFER ZONE (Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it. BANES have long said that the green belt protects it. Now it plans to remove this protection.

(Insert reasons for objections in your own words)

If Bath loses it's World heritage Status this will severely impact on the whole of Bath.

-HERITAGE ASSETS: CSA 22/6p19 refNPFF Clause 132 (moving the boundary/ protecting the Wansdyke, a national monument that runs through from St Gregory's school to the Cross Keys Pub)

(Insert reasons for objections in your own words)

This is an area enjoyed by locals and visitors. We should encourage people to walk in the fresh air in this beautiful landscape rather than people having just shopping areas to walk in.

-ECOLOGY/WILDLIFE refCSA22/5 p18 (the area is used as a foraging area for an endangered species e.g. Horseshoe bat. They use the trees, but would be hindered by light and noise of any development. The skylark, also endangered, uses the area as a breeding ground. Dark skies are fundamental to retain the beauty of this landscape. Mitigation of these issues is not possible.

(Insert reasons for objections in your own words)

This amazing local wildlife will be destroyed.

We already endure the hideous recycling depot. Surely this is our chance to embrace what we have of local beauty and to be proud of it.

**Change to the policy requested:**

**Respondent Number:** 5052 **Comment Number:** 1 **Respondent Name:** Mark Summers

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I object strongly to the proposed housing development to the Green Belt land adjacent to the Wansdyke.

This is an area of outstanding natural beauty where my family and I have spent many pleasurable hours exploring.

I am strongly concerned that building on this land will not only destroy the lovely countryside that surrounds our home, but also will end up making the area in which we live much more congested. The safety of young children playing on their bikes is of huge concern when the level of traffic to the area is increased.

I am sure that many families in this area feel the same, it will be a huge impact on our lives and many people enjoy the natural beauty of this area, it is the reason that we moved here.

To think that all of this wonderful countryside could be taken away just for financial gain feels an outrage.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5064 **Comment Number:** 1 **Respondent Name:** Richard W Dando**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:****Support:** 

The proposal is fundamentally wrong due to the fact that:

Bath is a World Heritage City. This classification is partly dependent on its setting, being surrounded by Green Belt and AONB, which is put at serious risk by the proposal.

The proposal contravenes the NPPF in that “exceptional” and “wholly exceptional circumstances” have not been proved as far as re-designating Green Belt land or allowing development which hazards a Scheduled Ancient Monument i.e. Wansdyke.

The area sought is significantly in excess of that required for the planned number of new homes and indicates an expectation of further development in the future. To allow the current proposal risks providing a precedent for further encroachments into Bath’s crucial Green Belt in this particularly sensitive area.

**Change to the policy requested:**

Delete “Land adjoining Odd Down” from the proposed Strategic Sites amendments.

**Respondent Number:** 5065 **Comment Number:** 1 **Respondent Name:** Mr Raymond Friel**Respondent Organisation:** St. Gregory’s Catholic College**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:****Support:** 

On behalf of the governing body of St. Gregory’s Catholic College, I would like the following points to be noted:

- We support in principle the increase in housing development needed in B&NES to meet increasing demand
- We are very concerned that a vehicle link is being proposed from Combe Hay Lane to the new development in Odd Down. This would cause a significant increase in congestion around the school site and an increase in risk to our staff and children.
- We would support a vehicle access from Midford Road, at the Cross Keys junction.
- We would hope to see Odd Down Football Club retained on its current site. If that is lost we would lose a significant part of our parking capacity and that would lead to significant congestion in the area.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5066 **Comment Number:** 1 **Respondent Name:** Philip Raby**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

I am opposed to the development on the Southstoke Plateau for the following reasons:

1. By building on a Green Belt/AONB site next to the Wansdyke, you are contravening the latest National Planning Policy (ref: CSA/7, CSA/10, CSA/17, CSA/20, 21, 22, 23, B&NES POLICY B3a and NPF Clauses 79 -88.
2. One of the major reasons why Bath has World Heritage status is because of its buffer zone between town and country. This development will destroy that buffer and jeopardise our WH status.
3. The idea of a road (referred to as a potential access road) beside Brantwood leading onto Southstoke Lane is absurd. It is a little lane with barely enough room for cars to pass. The suggestions that hundreds of cars can come and go along that road is a recipe for disaster. (Ref CSA22/&p21)

**Change to the policy requested:****Respondent Number:** 5070 **Comment Number:** 1 **Respondent Name:** Robert Hopwood**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

I consider the amendment to the Core Strategy not sound as explained in the guidance note. The plan should be the most appropriate strategy, when considered against the reasonable alternatives.

I am a resident local to the area surrounding Odd Down and am concerned about the impact on the local ecology. We get a number of bats in the local area and there are known feeding sites locally that are protected by the law. I am concerned that development in the area will have an impact on these areas.

The Wansdyke is not protected by these plans.

**Change to the policy requested:**

I believe that there is a clear alternative in building on land already within the Bath city limits. There is clearly a weighting in the proposals to increase urban sprawl by extending into the Greenbelt. I believe that better utilisation of the space available in Fox Hill alongside development of the Bath West Riverside would be able to provide housing in line with needs. I am concerned that this proposal has been chosen as a quick fix option of building on a Greenbelt in an area of outstanding natural beauty instead of concentrating on Brownfield sites.

**Respondent Number:** 5070 **Comment Number:** 2 **Respondent Name:** Robert Hopwood**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

I consider the amendment to the Core Strategy not sound as explained in the guidance note. The plan should be the most appropriate strategy, when considered against the reasonable alternatives. This means the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.

The Red lion roundabout was shown to be at capacity by the application for Sainsbury's in Odd Down. The additional homes will add to the traffic. The proposed access to Southstoke Lane and the cross Keys roundabout will create access to the Park and Ride which will become a bypass for any transport from the East wanting to use this facility.

**Change to the policy requested:**

The infrastructure strategy needs to be developed before this housing development can be considered. Creating a bypass under the banner of housing development on an area of outstanding natural beauty is not what this policy is set out to do and should not be allowed to be used as such. Transportation down the Wellsway and over the Red Lion Roundabout is congested at its current level. Placemaking principal 4. states the development should be well connected to the local area. I state that the congestion will mean that this will not be the case. The number of dwellings will impact significantly on traffic.

**Respondent Number:** 5072 **Comment Number:** 1 **Respondent Name:** Peter Langkilde**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

The latest National Planning Policy Framework says that building next to Heritage Assets is wrong unless there are "wholly exceptional circumstances." The proposed site for the 300 houses on the Southstoke Plateau includes the Scheduled Ancient Monument of the Wansdyke. Is there really no other site for these houses so that the NPPF has to be so completely contravened?

In addition, the site is also an AONB which again contravenes the NPPF, yet this site has been chosen above other areas that do not have these designations.

**Change to the policy requested:**

I request that the policy is adjusted to remove the proposed development within the AONB and Green Belt at Odd Down/Southstoke.

**Respondent Number:** 5076 **Comment Number:** 1 **Respondent Name:** Paul Roper**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

It is my belief that site access and transport are a key problem that make the Odd Down / Southstoke site unsuitable for the building of houses.

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The potential access road along “Brantwood’s” northern boundary to Southstoke lane would require the widening and urbanisation of Southstoke Lane.

Furthermore access to the west side will result in more traffic on the A367 / A3062 which is already completely congested. The A367, A3062 and B3110 are already hugely congested roads – leading to massive queues at peak times. The A367 is particularly congested as is access to Bath via Wellsway.

80% of the staff that work with me in Bath live in the Radstock / Frome / Peasedown areas and the journey to work on the A367 is an absolute nightmare. This road is already completely unsuitable for the volume of traffic that it carries and by adding more houses in Southstoke will simply make an already bad situation a lot worse.

Any scheme that adds to this congestion should in my opinion be avoided.

**Change to the policy requested:**

I would remove Odd Down / Southstoke as a potential site for development of houses.

There are locations that have a much lesser impact on traffic congestion because they access Bath along routes that are less congested. Access along the A4 on the west side of Bath is much less severe than the A367.

**Respondent Number:** 5077 **Comment Number:** 1 **Respondent Name:** Paul Robson **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

It is my belief that site access and transport are a key problem that make the Odd Down / Southstoke site unsuitable for the building of houses.

The potential access road along “Brantwood’s” northern boundary to Southstoke lane would require the widening and urbanisation of Southstoke Lane.

Furthermore access to the west side will result in more traffic on the A367 / A3062 which is already completely congested. The A367, A3062 and B3110 are already hugely congested roads – leading to massive queues at peak times. The A367 is particularly congested as is access to Bath via Wellsway.

80% of the staff that work with me in Bath live in the Radstock / Frome / Peasedown areas and the journey to work on the A367 is an absolute nightmare. This road is already completely unsuitable for the volume of traffic that it carries and by adding more houses in Southstoke will simply make an already bad situation a lot worse.

Any scheme that adds to this congestion should in my opinion be avoided.

**Change to the policy requested:**

I would remove Odd Down / Southstoke as a potential site for development of houses.

There are locations that have a much lesser impact on traffic congestion because they access Bath along routes that are less congested. Access along the A4 on the west side of Bath is much less severe than the A367.

**Respondent Number:** 5079 **Comment Number:** 1 **Respondent Name:** Oliver Gould **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

It would be a great shame to take this irreversible decision about our green belt lightly. I would very much like to see more options for using brown belt land looked into regardless of the additional costs as these plans are permanent once implemented. It seems crazy that green belt land and AONB including the ancient Wansdyke way should be in the middle

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of these plans. I feel although the revised core strategy looks to preserve the borders and existing hedgerows this will ultimately not be achieved. I am worried about the increased flow and movement of road traffic and the lack of details about this across the whole site. Combe Hay lane and Southstoke lane cannot take this extra traffic with single lane roads currently in place, also if there is a route across the entire site I fear it will be used as a shortcut or rat run during busy times of the day.

**Change to the policy requested:**

Please preserve this green belt site. We have chosen to live here due to the proximity of the countryside and have genuine concerns about how this build will affect our property value as well as our active lifestyles.

**Respondent Number:** 5084 **Comment Number:** 1 **Respondent Name:** Mrs Denise Weikert

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The land proposed for development at Odd Down/South Stoke is protected by its designation as Green Belt and as an Area of Outstanding Natural Beauty, the concreting over, noise and light pollution will be detrimental to the ecology and wildlife of the area once built on, it will be lost forever. Especially to the long established breeding ground for skylarks and rare species of bat. I do not feel mitigation is possible, there will be inevitable harm caused.

**Change to the policy requested:**

I would like to see the proposed changes to the Green Belt around Odd Down/South Stoke dropped and more use made of brown field sites within the Bath area. The whole area of Bath needs to be looked at together to ascertain need, the proposed building development at the former MOD site at Foxhill is just around the corner.

**Respondent Number:** 5085 **Comment Number:** 1 **Respondent Name:** Diana Hopkins

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Without 'exceptional circumstances', building on the Green Belt, in an Area of Outstanding Natural Beauty (AONB) which provides the setting of the World Heritage Site, contravenes the National Planning Policy Framework (NPPF). In the case of the Wansdyke Ancient Scheduled Monument, building alongside it would need 'wholly exceptional circumstances' (Ref: CSA/7, CSA/10, CSA/17, CSA/20, CSA/21, CSA/22 and CSA/23, B&NES Policy B3a and NPPF Clauses 79 to 88).

There are NO exceptional circumstances to allow this to happen. The required numbers of houses can be satisfied by increasing the density of the MOD site at Fox Hill.

**Change to the policy requested:**

The Odd Down/South Stoke development plan should be removed from the Core Strategy.

The Core Strategy should be consistent with the National Planning Policy Framework (NPPF). Where there is a departure, Councils must provide clear and convincing reasoning to justify their approach. B&NES have not done this, and therefore this proposal is unsound.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5085 **Comment Number:** 3 **Respondent Name:** Diana Hopkins**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

Heritage Assets

The southern boundary zone provides a distinct separation of the 'Cotswold' village of South Stoke from Bath. South Stoke Conservation Area is a clear acknowledgement of the importance of this village and its surrounding area. It must be properly protected against inappropriate development. The northern boundary of South Stoke should remain the Wansdyke.

(Ref CSA/22/6 p19 and ref NPFF Clause 132).

**Change to the policy requested:**

The Odd Down/South Stoke development plan must be removed from the Core Strategy.

**Respondent Number:** 5085 **Comment Number:** 7 **Respondent Name:** Diana Hopkins**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

1 The area targeted for the removal from the Green Belt is of exceptional ecological importance for the following reasons:  
1 It is recognised as a foraging area for a rare and protected species of bat – the horseshoe bat. The routes these bats take from roost to hunting grounds would be damaged by development on the plateau, and this could have an impact on the survival of the colonies in the area. Since this is a protected species, this cannot be allowed to happen.

2 The area has long been a nesting site for skylarks. Skylarks are labelled red by the RSPB, meaning they have the highest conservation priority, with species needing urgent action. They have seen their populations decline dramatically in recent years; according to the RSPB "in the UK, the population halved during the 1990s, and is still declining. In the preferred habitat of farmland, skylarks declined by 75% between 1972 and 1996." Skylarks cannot nest in gardens or urban landscapes, and therefore, the changes proposed by BANES would result in a loss of this population of skylarks forever.

Reference

<http://www.rspb.org.uk/wildlife/birdguide/name/s/skylark/index.aspx>

3 The dark skies with no glow from light pollution accentuate the setting of Bath as World Heritage Site. Development of this site would mean this would be lost forever.

**Change to the policy requested:**

The Odd Down/South Stoke development plan must be removed from the Core Strategy.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5085 **Comment Number:** 2 **Respondent Name:** Diana Hopkins**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

World Heritage Site Buffer Zone

B&NES have repeatedly made the point that Bath is protected by the Green Belt and does therefore not need a specific buffer zone to protect the World Heritage Site setting. UNESCO require a 'Buffer Zone'. Removing the South Stoke plateau land from the Green Belt will contravene the requirements of UNESCO and therefore have serious implications for the status of Bath as a World Heritage Site. (CSA/7)

**Change to the policy requested:**

The Odd Down/South Stoke development plan should be removed from the Core Strategy.

The Core Strategy should recognise the unique setting of Bath and how its World Heritage Site status is reliant on the Green Belt remaining as a Buffer Zone. The current plans to build on the Green Belt contradict B&NES arguments that they will maintain a Green Belt around Bath, and therefore contribute to making the Core Strategy unsound.

**Respondent Number:** 5088 **Comment Number:** 1 **Respondent Name:** G Davis**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

I am concerned with PLACEMAKING PRINCIPLES

7)

Interconnect with Sulis Meadows Estate and Sulis Manor ,connecting existing roads into the new development .This should include pedestrian and cycle links.

Connecting roads from the new development to Burnt House Road and thus Sulis Manor Road, would cause severe congestion along these roads.

Sulis Manor Road would become a rat run. Burnt House Road would be continuously blocked.

The A367 and Frome Roads are congested as it is, the building of 300(the proposed area allows for more than 600) new houses is going to add over 500(assuming majority of households have 2 vehicles per household) additional vehicles onto these roads.Notwithstanding the development of 700 homes at Foxhill. The A367 and Frome Roads would come to a standstill.

It seems to me that this development of green belt is planned for a quick fix for the Council as the MOD site development will be delayed because of contamination problems.

So how is the current infratstructure going to cope if this development goes ahead. What plans have the Council made in this regard.

Why is it necessary to remove so much land from the Green Belt.

For 300 houses you do not need so much land,perhaps the Council is to build 600 houses ?

Why not utilise the brown belt land available in Bath instead.

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I support the additional needs of more housing in Bath, but the quick fix the Council is seeking by the use of the Green Belt is deplorable..What piece of Green Belt in Bath will go next Victoria Park?

Change to the policy requested:

**Respondent Number:** 5096 **Comment Number:** 1 **Respondent Name:** Alan Tissington

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

Support:

The proposed development shows a "potential access road" to the new development along Brantwood's northern boundary. This lane is a single track and could not cope with increased traffic. If this track were established it would guarantee that the whole plateau became subsumed in suburban sprawl. This would undoubtedly jeopardise Bath's designation as a World Heritage Site which requires a buffer zone.

Change to the policy requested:

I request that the proposed "potential access road" along Brantwood's northern boundary to South Stoke Lane be removed and that all access to the site is form the west, adjacent to the Park and Ride.

**Respondent Number:** 5099 **Comment Number:** 1 **Respondent Name:** Jennifer Weinel

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

Support:

I object strongly to the proposed changes to the Green Belt land adjacent to the Wansdyke for the following reasons:-  
-GREEN BELT/AONB: (ref NPF Clause 79 to 88.)

I object to the changes at Odd Down/South Stoke because:

- Bath is a World Heritage City and dependent on its green belt setting in an AONB to retain this.

-DEVELOPMENT PLAN: (see BANES ref CSA22 and their Green Belt diagram CSA23 Annex 1 page 570) (why is it necessary to remove so much land from the Green Belt)

I object to the changes at Odd Down/South Stoke because:

- There are suitable unused brown field sites in Bath available and should be used first.

-SITE ACCESS AND TRANSPORT: BANES ref CSA 22/7 p21

I object to the changes at Odd Down/South Stoke because:

- More housing will increase the current heavily congested roads at Odd Down.

- Increased traffic on the A367 in and out of Bath will result in even greater delays than are already experienced daily.

- Sulis Manor Road is narrow, and unsuitable for increased traffic.

- Any increase in traffic will pose a danger to school children.

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-WORLD HERITAGE SITE BUFFER ZONE (Bath is the only World Heritage City in England. UNESCO requires a buffer zone to protect it. BANES have long said that the green belt protects it. Now it plans to remove this protection.

I object to the changes at Odd Down/South Stoke because:

- Bath is a World Heritage City; this status is dependent upon its beautiful green setting.

-HERITAGE ASSETS: CSA 22/6p19 ref NPF Clause 132 (moving the boundary/ protecting the Wansdyke, a national monument that runs through from St Gregory's school to the Cross Keys Pub)

I object to the changes at Odd Down/South Stoke because:

- The local authority has a duty to protect the Wansdyke which is an ancient monument.
- Developing the Odd/Down site will cause damage to the Wansdyke.

-ECOLOGY/WILDLIFE ref CSA22/5 p18 (the area is used as a foraging area for an endangered species e.g. Horseshoe bat. They use the trees, but would be hindered by light and noise of any development. The skylark, also endangered, uses the area as a breeding ground. Dark skies are fundamental to retain the beauty of this landscape. Mitigation of these issues is not possible.

I object to the changes at Odd Down /South Stoke because:

- It will destroy the habitat of many creatures and birds.
- It will increase pollution in all forms.
- It will change the landscape by introducing lights at night.

**Change to the policy requested:**

**Respondent Number:** 5101 **Comment Number:** 1 **Respondent Name:** Jim McAuliffe **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

Support:

It beggars belief that BANES is considering permitting housing developments on the South Stoke Plateau, given that this includes an AONB, the site of the Wansdyke ancient scheduled monument, the beauty of the countryside, the UNESCO status of Bath, the ecological imperatives (horseshoe bats, skylarks,)etc, etc.

There are many, many better alternatives for housing. Such desecration of beautiful countryside would be a huge disservice not just to the residents of Bath, but to Bath's status and reputation.

**Change to the policy requested:**

Core Strategy Green Belt Amendments, specifically the proposal in relation to site housing on the South Stoke Plateau.

**Respondent Number:** 5104 **Comment Number:** 1 **Respondent Name:** Sandra Byrne **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

Change Reference: CSA22 Land adjoining Odd Down

Location:

Comment made on the Proposed Change:

Support:

I wish to make a strong objection to houses being built on the Green Belt around Sulis Meadows in Bath (your ref CSA22). I believe that BANES Council has agreed to building work for 300 houses beginning in two years time. If only 300 houses have been agreed to, why does diagram CSA23 show a much larger area of the green belt being expropriated? This suggests many more houses being built in the future, if they are to equal the Sulis Meadows estate density, which is about 700 houses on that size of land. I am an owner of a property in Sulis Meadows and I object to any houses being built on the fields surrounding the Sulis Meadows estate on the following grounds:

1. I have a dog and I walk him in the beautiful fields around Sulis Meadows. This was one of the reasons I bought into Sulis Meadows. This is AN AREA OF OUTSTANDING NATURAL BEAUTY, which is why dog walkers like me enjoy walking here. An AREA OF OUTSTANDING NATURAL BEAUTY has, I believe, one of the highest levels of protection under planning regulations. So, in my opinion, and in the opinion of MANY other residents, this area should not even be being CONSIDERED for building upon! This is flouting our planning laws, which aim to keep our land from becoming one big urban sprawl!!
2. When walking my dog, I have noticed many black squares of carpeting/rubber, spaced at regular intervals on the ground around the fields in the area under consideration. Also, there are many black plastic tubes strung on the trees. We are led to believe that these are research projects into the habitat of the fauna in this Area of Outstanding Natural Beauty. I have also noted, on early morning walks, a machine in the fields, which is gone by lunchtime, which, I think, is used to record bat activity. BATS ARE A PROTECTED SPECIES - BY LAW. Why would BANES Council, or the Government, who make these laws, want a bat feeding area be assailed and demolished by buildings? This Area of Outstanding Beauty is a known bat feeding area. It ALSO is an area used for breeding by skylarks. Dark skies are necessary for both species to survive in this area. Building here means this area will be lost to them forever and cannot be replaced
3. Adjacent to our estate is the Wansdyke, a part of which is also used for walking dogs and in Summer the green area is used for picnicking and general people relaxation. However, it is not only that the Wansdyke (and the surrounding fields) are a stress-releasing place for residents of Sulis Meadows and Odd Down - away from urbanisation, the WANSDYKE IS A PIECE OF OUR HISTORY and needs to be preserved.
4. Further housing will mean further congestion of traffic on the Park and Ride roundabout and down the Wellsway into Bath (and back up it at rush hour home time, which already has queues almost reaching Bear Flat on the single carriageway leading to the Red Lion roundabout and further up the road to the Park and Ride). This congestion will not be relieved by more buses being provided. Additional housing is being built in Radstock and Peasdown St John. Residents of these two towns already use the Odd Down Park and Ride, so the new housing will already mean more people travelling to utilise this P&R facility.
5. And the idea that a road be provided from South Stoke Lane to the Park and Ride is preposterous! This will create a dreadful rat run through the estate. Cars will cut through from Midford, Combe Down, new Foxhill and surrounding places to avoid the congestion of Wellsway, in order to get to the Park and Ride. The Odd Down Park and Ride will need to be expanded to accommodate more cars. More cars = more pollution = less area of outstanding natural beauty = less natural habitat for animals and birds.
6. And not only will this affect the fauna surrounding our beautiful city of Bath, it will affect the people of Bath too and the HISTORY of Bath. Bath is the ONLY city in the United Kingdom to acquire status as a World Heritage Site. It acquired this status on account of its beautiful buildings AND ALSO on the surrounding green belt and hills. An Area of Outstanding Natural Beauty. UNESCO require a 'buffer zone' for a World Heritage City. This buffer zone is our AONB! If BANES Council do not honour this UNESCO requirement, soon all the villages will be affected by this proposed urban sprawl by being connected to Bath and Bristol - we will be one big city! Surely this is something that can be envisaged if we continually flout laws that were made to prevent this very thing happening?
7. And all of this angst could be prevented. There are alternatives to building on the fields surrounding Sulis Meadows. BANES Council, and our Government are aware of these. 1) Increase the density of housing by 10% in Bath. 2) We need to

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make the best use of land WE ALREADY HAVE AVAILABLE TO BUILD ON. 3) LISTEN to the residents of Bath and do a proper survey. BANES Council promised a survey of the Sulis Meadows 'proposed site' over a period of one year. They did it in 2 weeks!

What is happening to the MOD site in Combe Down? Why is this proposed housing build in Sulis Meadows going to go ahead before Foxhill and Bath's West Riverside are developed? I received recently a Connect magazine through my door and was impressed by the proposed plan to develop the Riverside of Bath - so why the rush to build in Sulis Meadows in the next two years?

8. And last, but no means least, on a personal note, as many of the estate's residents feel - we have had a dreadful time with our housing prices dipping since 2008, and now, just when it seems the housing market is rising from the ashes, if we wanted to sell, we are hit with proposed building work on our beautiful fields, traffic congestion, more people, more noise and, therefore, a very probable devaluation of our properties, should this proposal go ahead.

I STRONGLY OBJECT TO THIS PROPOSAL OF BUILDING ON THE GREEN BELT AREA SURROUNDING SULIS MEADOWS ESTATE.

Finally, I wish to quote two Government Ministers,

1) The Rt Honourable Eric Pickles MP, who stated at the Conservative Party Conference in 2012:

'the Green Belt plays a vital role in stopping urban sprawl - and we will protect it'

He went on to say in an article in the Telegraph, published 26 March 2013:

'I want to set out what the government is doing, and as importantly, what we aren't doing. Firstly our reforms safeguard our glorious green spaces and countryside. They protect the green belt - that vital green lung that prevents urban sprawl. And they defend Areas of Outstanding Natural Beauty, and other important environmental designations. Nothing will change that today. Nothing will change that tomorrow. [Bold is mine]

Secondly, we are making the most of every single square inch of brownfield land, every vacant home and every disused building.....'

Are you, the Rt Honorable Eric Pickles? Are you going to be honourable and ensure your reforms defend our Area of Outstanding Natural Beauty surrounding Sulis Meadows in Bath? Will you protect our green belt? 'Nothing will change that today. Nothing will change that tomorrow.' I hope you meant that, Sir!

And 2) Local Government Minister, Brandon Lewis, who, in a written Ministerial Statement on 1st July 2013, said:

'Having considered recent planning decisions by councils and the planning inspectorate, it has become apparent that, in some cases, the Green Belt is not always being given the sufficient protection that was the explicit policy intent of Ministers.

The Secretary of State wishes to make it clear that, in considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for traveller or for conventional housing, is unlikely to outweigh harm to the green belt and other harm to constitute the "very special circumstances" justifying inappropriate development in the green belt.'

I sincerely hope that the Government Ministers in charge of assessing this proposal CSA22, and its accompanying diagram CSA23, take into account these former, and recent, statements by their ministerial colleagues, and REJECT this inappropriate development in the green belt surrounding Sulis Meadows, Bath.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5105 **Comment Number:** 1 **Respondent Name:** Mrs Samantha Purrier**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

In reference to CSA 22 -B3A .5. Bath is a unique city and location - a World Heritage Site - a status that requires the retention and preservation of the land surrounding and buffering the city from becoming itself a suburb of the ever increasing housing developments of nearby towns and once villages. The Green Belt encircling Bath is therefore important at every site, but the consequences of building at the Southstoke Plateau/Odd Down are detrimental on many levels - this is an AONB, a place where rare species thrive and the location of the Wansdyke - ancient monument, that has already been in part harmed by the previous development at Sulis Meadows. This ancient feature is an asset that should be protected and the landscape in which it is embedded be preserved - A policy that BANES acknowledges. but is prepared to sacrifice - " Developments causing substantial harm to designated assets of their settings should be avoided" (Policy B3A). The natural landscape of the Plateau provides habitat for Sky Larks and a Bat Population, which would be squeezed by this development and there is the real risk that the processes of development, the light pollution and the increase of cars and people would impact negatively on these sensitive creatures. The policy states that light pollution would be at 1 lux, this is low, but still prevents dark night skies - that are so important for conservation. To access the new development there will be a considerable damage to the views and nature of the lanes - particularly at Southstoke Lane and Combe Hay Lane. " The character of the lanes`' (B3A7) by the increase of traffic, lighting and signage. The amended core strategy policy CS A22 frequently contradicts itself - how can it be possible to build 300 houses without negatively impacting on the beauty, views, natural habitat for rare species and nature of conservation villages. The simple answer is it can't. What the council can do is to rethink and stagger developments - There are too many empty properties and brown sites within the city itself that would benefit from redevelopment - and there would be applause and support from residents. Another factor that should be considered by the council is that transport via bus is expensive, crowded and not always reliable. the current alternative is to walk which takes nearly 1 hour from Southstoke - an unfeasible option for sustainable transport options to the work place.

**Change to the policy requested:**

We feel it is unreasonable and unnecessary for the planning inspector to demand a set quota one size fits the whole of the UK development policy. There is already a development planned at the Fox Hill MOD site, which makes good sense as it is already built upon. This is the type of planning and development we think should provide an alternative to destroying the Green Belt, for the sake of a quota and to improve the developers margins.

**Respondent Number:** 5109 **Comment Number:** 1 **Respondent Name:** Nick Warren**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

CSA25 (Plan Ref: Policy B3B) Strategic Site Allocation – Land Adjoining Weston (Lansdown Lane) Site E  
At Para 12 of ID/40 the Inspector seeks further clarification of the proposed removal of land from the Green Belt to the north of Weston Village seeking greater clarity about the location with the objective of improving associated hearing sessions. The resulting Placemaking Principles set out in CSA25, when taken with the content of Policy Document B3B (Bath Weston), are strongly weighted towards perceived benefits, in economical and social terms, that may result after development has occurred. These, although in all probability well researched, can only be subjective and should not carry an inordinately predominance when considering the suitability of the land under consideration for removal from the

Green Belt. The development issues caused by the geological nature of the land should be better exposed in the documentation with clear and achievable mitigations that must be undertaken pre the removal decision rather than addressed by comments such “careful consideration is required through master planning” which it is assumed would take place after the final decision on removal of land from the Green Belt has been made. There is also inference that such issues could be dealt with at the Planning Application stage again after the removal decision has been made. In respect of Sites D2 and E there is thought that these Sites would be most attractive to developers with their ease of access for plant machinery and construction paraphernalia and it is hoped that this factor is not the main driver for these Sites being included in the proposed Strategic Plan.

On the observations that Site E will provide access to a variety of employment opportunities in the City it is unclear what the levels of these opportunities will be other than ethereal estimates thus calling into question the use of such statistics when assessing the building land needs of the City. The argument that building on land taken from the Green Belt will allow its prospective residents to live closer to their work is open to challenge as it is probable that many prospective purchasers will be equally attracted by the proximity of Lansdown Lane to the road network to the north of the City, including the M4 corridor, and the employment opportunities to be found there.

There are brownfield sites within the City with various dph figures promulgated. There is scope for these allocations to be reviewed to marginally increase their dph densities thus reducing the need to reclaim areas of the Green Belt in Upper Weston. To assist the consultation an estimate is required of the brownfield assets remaining within the City and its environs, if all the proposals for Weston in the Core Strategy were to be taken up. There must be areas which if used will diminish the need to reduce the Green Belt and better meet some of the many times repeated objectives appearing within the Core Strategy related to, better access to training facilities and employment within the City and to allow the workforce to live closer to their employment. Such brownfield development could mean the retention of the Greenbelt above Weston village and no increase to traffic congestion within the village itself. It will negate the need to further research and mitigate underlying geology issues on the slopes above Weston village and will reduce the traffic accident risks on Lansdown Lane and where it joins Lansdown Road. Additionally there would appear to be no reference to the extent and location of ‘land banked’ in the ownership of developers. Land which must be used in tandem with the brownfield assets to mitigate Green Belt removal.

The lack of greater exposure of the geological issues weakens the consultation process and the clarity sought by the Inspector has been lightly address. It therefore calls into question the soundness of the Core Strategy.

ID/40 suggests a level of frustration on the part of the Inspector related to progress and presentation of material for his consideration and that worryingly he states that “ he will have little time for additional preparation, not already planned, to absorb new material because of existing commitments”.

#### Placemaking Principle 1

A development of 150 dwellings is indicated. Parts of Site E are high risk due to underlying geology and are unsuitable for development. No indication of the actual number of dwellings that could be constructed on Site E at an average density of 35-40dph has been offered.

#### Placemaking Principle 2

Comprehensive master planning would feature post the decision on removal of land from the Green Belt and therefore its promulgation at a later date does nothing for the current consultation process.

#### Placemaking Principle 3

The provision of Green Infrastructure and the need to have pedestrian/cycle connectivity towards Weston Village show a lack of awareness of the topography of the area to the south of Site E. Little of these activities will take place with cars being the predominate method of movement.

#### Placemaking Principle 4

This Principle contains too many “shoulds” and needs to be more assertive and accepting that the issues need resolution before a final decision on Green Belt land for release is made. The Concept Diagram (Change Ref: CSA26/28) and Summary Comments related to Site E recognise that parts of the area are high risk due to their underlying geology and are unsuitable for development. The Concept Diagram has only an ill defined reference to the risk area location with no indication of its size or boundary. The associated Summary Comments do not address:

- a. the nature of the underlying geology of the "unsuitable area" within Site E,
- b. the type and scope of any mitigation work that might be required within the "unsuitable area" to allow development immediately adjacent to it to take place,
- c. the probability of changes to existing spring locations and the surfacing of new ones within the "unsuitable area", Site E

as a whole and the existing estate to the south of Site E,

d. what significance influence on Site E and the existing estate to the south of Site E will development have as a consequence of being in Flood Zone 1,

e. the instant gradient difference between Site E and the gardens adjacent to its southern boundary which will mean that the Napier Road area will receive greater levels of ground water runoff generated by the construction of dwellings and associated roads and pathways above it. Especially so if rafting is employed to provide acceptable footings for house construction,

f. the identification and repositioning of sewers that may possibly exist between Heather Farm and Napier Road, and

g. the possibility of increases in house insurance premiums due to building on Site E exacerbating the risk of springs rising in locations hitherto free of them.

Any development can be expected to generate issues on the existing estate to the south of Site E. This estate already experiences some problems with springs and substantial amounts of groundwater runoff from the land to the north and the upper regions of Lansdown Lane, where the road drainage does not adequately deal with the increasing intensity and volume of rain fall now being regularly experienced. The groundwater runoff is particularly concerning to residents on the south side of Napier Road where many of the properties are below street level. If development within Site E results in an increased emergence of springs within the estate to its south the mitigation of problems arising must not fall to its residents post development. Land now designated as Sites E and F were considered for development in the past with an entry/exit way off of Napier Road prepared. The development did not happen and the entry/exit way was later released and dwellings erected over it. This earlier proposal does not appear to be referenced in the current documentation as it would be useful to know what has occurred in the interim years to now make Site E an acceptable candidate for removal from the Green Belt.

Placemaking Principle 5

As with Placemaking Principle 3, the topography of the land south of Site E will mean that walkways will be little used in what will be an area with a high dependency on cars.

Placemaking Principle 6

The Summary Comments quite rightly reference habitat and biodiversity with a further site assessment and Ecological Mitigation Strategy for Site E a requirement. However, it is unclear if the further work to broaden the preliminary surveys already undertaken is to occur before or after the decision on the Core Strategic Site Allocations is made. The retention of hedgerows and woody species bordering Site E will be welcomed but it raises related points. Where the retained hedgerows have eroded will they be rehabilitated? It may be that a proportion of the Target Noted Trees for retention are situated outside Site E in the gardens of adjoining properties. The recommendation that the tree cluster adjacent to Lansdown Lane should remain should be further explored as it is understood that a number of the subject trees (in particular the poplars) will require future management which should not fall to residents. The provision of Green Infrastructure and the need to have pedestrian/cycle connectivity towards Weston Village shows a lack of appreciation of the topography as already referenced in the responses to Placemaking Principles 3 and 5.

Placemaking Principle 7

The SA Matrix Objective 13 for Bath Weston correctly indicates a negative return in respect of protection and enhancement of the district's historic, environmental and cultural assets. This negativity is not adequately expressed in Principle 7 when related to Site E.

Placemaking Principle 8

The Concept Diagram (Change Ref: CSA26/28) indicates two new entry/exit roads to facilitate additional traffic flow onto and from Lansdown Lane to serve Sites D2 and E. The Site D2 entry/exit point is located just south and opposite the existing Napier Road entry/exit. The proposed Site E entry/exit point being located on the same side as the Napier Road entry/exit and just to its north. The confluence of three entry/exit points in close proximity to each other at an already extremely dangerous point on Lansdown Lane, situated as it is at the bottom of an approximately ½ mile long hill with a maximum 20% gradient, will significantly increase accident risk to vehicles, cyclists and pedestrians transiting the area. Furthermore the left hand curve of the road opposite Heather Farm when travelling south will make the Site D2 entry/exit point undetectable to traffic. Mitigation of the increased accident risk will not be achieved by the recently introduced 20mph Zone which commences at this point and does little to decrease the downhill speeds of approaching vehicles. Mapping showing elevations and surface configuration at this location should be available rather than the one dimensional street diagram offered as the gradients that feature in this area must be fully revealed when considering the Strategic Plan.

The Summary of Comments for Site E stress good accessibility into the City and to medical facilities amongst other perceived benefits. Benefits which would appear to be reflected across all the Weston related Sites. With reference to medical facilities it should be noted that doctor's surgeries are located at a distance from Site E to the south and east of Weston Village where on street parking is already virtually non-existent and not all practices are readily reachable by public transport. As for accessibility into the City the additional traffic emerging from Site E, and the adjacent Site D2 (possibly in excess 200 vehicles), will aggravate the traffic congestion which is already a common feature of Weston High Street and in particular through the "pinch point" between the roundabout at the bottom of Lansdown Lane and where it is joined by Penn Hill Road. Dean Hill Lane (part) and Southlands will become 'rat runs' for Upper Weston traffic wanting to leave/return from the south west of Weston Village. The increase in traffic from Site E and Site D2 will impose a negative effect on traffic flow onto/from Lansdown Lane where it joins Lansdown Road. A known accident black spot.

Placemaking Principle 9

No comment other than to record that children will be driven to/from schools rather than utilising the proposed pathways.

Placemaking Principle 10

This Principle recognises the need for sustainable construction on Site E and references that issues surrounding appropriate construction will seek third party delivery options. Thus the consideration of allowable solutions will be deferred until after the possible release of Site E from the Green Belt and consequently issues of unacceptably cannot be reviewed now even though they are relevant to the decision making process.

Placemaking Principle 11

Principle 10 correctly states that high risk development, in terms of the underlying geology of Site E, is to be avoided unless satisfactory remediation work can be demonstrated by a potential developer plus a full ground investigation survey to determine the site specific ground conditions should be undertaken to inform the "Masterplan". Surely this fundamentally important issue in determining if Site E should be released from the Green Belt cannot be delayed until after the Strategic Plan is finalised. It is noted that Objective 18, in the SA Matrix for Bath Weston, indicates a double negative for Site E. A treble negative for this area would be more appropriate when compared with other Weston Sites as its geological issues are more significant.

**Change to the policy requested:**

Core Strategy Green Belt Amendments, specifically the proposal in relation to site housing on the South Stoke Plateau.

**Respondent Number:** 5110 **Comment Number:** 1 **Respondent Name:** Nicolas Alexander

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

Support:

CSA22/5 (Landscape Mitigation)

Adequate protection is not being given to the South Stoke Conservation Area. Development is proposed too close to the Conservation Area boundary. The "Potential Access from South Stoke Lane" is hugely detrimental to the village and is unnecessary.

"Limit[ing] the height and/or density of development closest to South Stoke Conservation Area to avoid and minimise harm to its setting" is not an adequate response to the hugely important issue.

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CSA22/6 (Heritage Assets)

Adequate protection is not being given to the Wansdyke Scheduled Ancient Monument.

CSA22/1

The land allocation proposed to be removed from the Green Belt at Odd Down, provides space for far more than 300 units and should be reduced substantially. Developers will seek to deliver 500-600 units on this large land allocation, with very significant detrimental impact on the South Stoke Conservation Area and the Wansdyke SAM.

**Change to the policy requested:**

**Respondent Number:** 5113 **Comment Number:** 2 **Respondent Name:** Dr. Shepherd

**Respondent Organisation:**
**Agent ID:** **Agent Name:**
**Further Information available in the original comment?**  **Attachments sent with the comment?** 
**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**Support: 

CSA 22. The proposed changes would detract from , and harm the world heritage setting of Bath and the conservation areas around Bath.

**Change to the policy requested:**

Existing Brown Field sites should be used. The Green Belt concept is sound and should be sacrosanct.

**Respondent Number:** 5115 **Comment Number:** 1 **Respondent Name:** Mary Roberts

**Respondent Organisation:**
**Agent ID:** **Agent Name:**
**Further Information available in the original comment?**  **Attachments sent with the comment?** 
**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**Support: 

I am strongly against the proposal to change the green belt to brown field status . Surly those areas were preserved to protect the beauty round Bath and it must be against the law to change such statutes.

I also feel that there is not sufficient infrastructure to sustain the proposed number of houses. The roads are clogged up as it is. You have only to come up from the city in the rush hour to understand that 1000 or so more cars would produce gridlock. What about schools and shops too?

I also feel that the roads through Sulis Meadow are not wide enough to take extra traffic to the new proposed developments. Sulis Manor Rd would become a rat run and living in the area would become a nightmare.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5117 **Comment Number:** 1 **Respondent Name:** Marie-Louise Jensen**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:****Support:** 

I'm writing about the proposed developments around Odd Down/Sulis Meadows, Bath. (Ref CSA 22)

This is an area of outstanding natural beauty, enjoyed by everyone in the area and should be preserved for future generations, not mindlessly destroyed to fulfil short-term needs.

It is also currently used for agriculture; which ought to be enough to preserve it from building. Britain already does not produce enough food for the needs of our population and the pressure on food supplies is only going to grow in the next years.

The transport from Odd Down into the city is already under huge pressure with both roads and buses overcrowded.

There are plenty of more suitable areas for building in Bath. The Riverside development is excellent and provides housing where the work is. The Foxhill development is just beginning. There is also a disgraceful amount of empty housing in Bath. The flats opposite Green Park have been empty and derelict for years and could be converted or rebuilt, as could the old social security building at the end of James St West. There are even derelict housing in Odd Down itself that ought to be made habitable (Kilkenny Cottages for example) before building over valuable agricultural land and destroying fine areas for ever.

**Change to the policy requested:****Respondent Number:** 5120 **Comment Number:** 1 **Respondent Name:** M&H Henebeury**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:****Support:** 

We oppose strongly the proposal to change the green belt designation of the Southstoke Plateau and the building of houses on the land.

The Southstoke Plateau Green Belt is an important buffer zone between suburban Bath and the countryside. Since we were children, the area has been used by people from the city and suburbs of Bath to walk, run, cycle, horse ride etc. This is even more prevalent today. Currently, the village is busy, at weekends and evenings particularly, with people enjoying the countryside – why take this enjoyment away from so many people for the sake of building houses which could be accommodated on ex-MOD sites or other more urban sites.

The buffer zone between town and countryside is key to all good planning – nobody, not even those that want a new house, wish to live in a concrete jungle. Bath's reputation as a beautiful city and World Heritage Site include its 'green lungs'.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

Wildlife will be adversely affected, the area has a good population of birds and small mammals as well as being a foraging area for rare bats as well as being a dark sky area – which is an essential benefit for the well being of humans and wildlife.

**Change to the policy requested:**

**Respondent Number:** 5122 **Comment Number:** 1 **Respondent Name:** Mrs Lynda Devenish

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

Support:

The South Stoke Plateau lies within the Green Belt and Cotswolds area of Outstanding Natural Beauty.

The site is directly adjacent to The Wansdyke Scheduled Ancient Monument and also forms a part of the World Heritage Site Buffer Zone which, although BaNES does not feel compelled to define, is nevertheless a requirement served by this site.

Under the NPPF wholly exceptional circumstances would need to be shown in order to develop this land and I do not believe that has been demonstrated in any form.

This site is also a breeding area for skylarks and a foraging area for bats.

The area proposed to be removed from the green belt could accommodate up to 700 dwellings, far more than the 300 proposed by BaNES which implies that further development on the site is highly likely.

For all the above reasons I consider these amendments to be unsound.

**Change to the policy requested:**

If somehow, wholly exceptional circumstances can be proven and development is inevitable then it should be limited to 300 dwellings and kept to the western end of the site and west of Sulis Manor with access to the site solely from Combe Hay Lane in order to avoid the Village of South Stoke being subsumed by the City of Bath .

**Respondent Number:** 5123 **Comment Number:** 1 **Respondent Name:** Sarah Lloyd

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

Support:

I grew up in South Stoke and my elderly mother still lives here. I am an artist, currently living in Australia. I visit regularly and often bring overseas visitors.

I have attached a letter out lining my reasons for objecting to the development of the green fields site between SouthStoke and Odd Down as inappropriate.

I have responded to the 4 key issues relating to South Stoke Plateau that the inspector will be taking into account.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

I very much hope this development will not go ahead. I think it is a very short sighted plan.

**Change to the policy requested:**

**Respondent Number:** 5132 **Comment Number:** 1 **Respondent Name:** Kaylie Allen

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I am writing this email to you, to oppose of the beautiful view outside my windows being ruined by properties being built there. The view from mine and my partners' kitchen and bedroom was the main selling point of our home when we moved in February this year. We both already had to deal with our first summer there being ruined by the field and car park being dug up for the water pipes to be put in, which was unbearable. I was getting woken up before sociable hours every morning, we couldn't hang our washing up outside because of all the dust blowing into our garden and to look out of the window to see a construction site rather than the beautiful field we were used to was really quite depressing, especially as the work lasted a lot longer than what was originally intended.

There's plenty of wildlife living in those fields and I find it such a terrible shame that their homes will be destroyed. I've seen a few deer prancing across the field since the last lot of construction has disappeared, before that we had some residential owls that used to fly around or sit in the trees hooting, but they've disappeared because of all the work that was going on. I've also seen a few falcons perching on the fences around the field and over 50 different species of other birds making homes in the trees and hedges.

I believe that if you ruin this area with housing, you will upset quite a number of residents and not just the people who have lived there for years, but the people like me and my partner who moved to this area purely because of the tranquillity. Loads of people even travel to those fields to meet up and walk their dogs; those fields are one of the few things helping bring the community together, which in this day and age is a very rare thing.

You may think that you're helping the younger generation and it will be the majority of elderly residents complaining but my partner and I are only 25 and we were planning on settling here for a fair few years from now. If this proposal continues to go ahead I can't see ourselves staying here if it does. It took us nearly two years to find our perfect place to live, now we're worried that we may have to move again for the third time in those two years because our beautiful view; the reason we moved here in the first place, will be ruined.

Keynsham is a peaceful town with amazing countryside views that no other town near by comes close to. Please don't take that away from us.

**Change to the policy requested:**

**Respondent Number:** 5133 **Comment Number:** 1 **Respondent Name:** Mrs JCM DavisS

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

GREEN BELT/ ANOB

This sensitive land is meant to have special protection which can only be removed in exceptional circumstances. Why has there been such a silence on this matter. If the land is really needed then prove it, otherwise it should remain Green Belt/ ANOB land

WORLD HERITAGE SITE

The land surrounding the City is as important to the setting of WHS status as the City itself. This fact seems to have been deliberately ignored and if the proposed core strategy goes through then Bath's WHS status could be rightly challenged and removed

HERITAGE ASSETS

The proposed development lies within probably the most sensitive area of land surrounding Bath, the Wansdyke Scheduled Monument immediately to the North and the ancient Saxon village of Southstoke, immediately to the South, a Conservation Area in its own right. To seriously put this forward as a Core strategy seems astonishing

**Change to the policy requested:**

NO EXCEPTIONAL CIRCUMSTANCES HAVE BEEN PROVEN TO ALLOW THE REMOVAL OF GREEN BELT/ ANOB LAND ON SOUTHSTOKE/ ODD DOWN PLATEAU. THE CORE STRATEGY IS THEREFORE UNSOUND AND THIS PART OF THE PROPOSED STRATEGY SHOULD BE IMMEDIATELY ABANDONED.

**Respondent Number:** 5136 **Comment Number:** 1 **Respondent Name:** Julian Bardo

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**Support: 

The amendment is not consistent with national policy. The area being removed from the Green Belt is not essential to meet the housing needs. National policy is that such an area, also in the CAONB and next to the Wansdyke, should be developed only where "exceptional circumstances" can be shown to exist. That has not been shown in this case. Indeed it seems that even Bath & North East Somerset Council do not see the need for all the proposed land to be removed from the Green Belt to accommodate the amount of housing required.

**Change to the policy requested:**

The proposal to remove the land adjoining Odd Down from the Green Belt should be cancelled, or a much more restricted area at the western end of the identified area should be removed from the Green Belt

**Respondent Number:** 5137 **Comment Number:** 1 **Respondent Name:** Miss Rosalie Jones

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**Support: 

I believe the South Stoke Plateau should be removed from the core strategy, or at least delayed as long as possible, because I have been studying the site and there is too much information to learn from the site.

According to the Survey carried out in 1996 by English Heritage (report attached) the site is at risk.

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The survey also makes a number of recommendations. Including the need to fully research the Wansdyke and asks a number of questions about the section of the Wansdyke bordering the north of the site.

I am keen to do a basic survey of the site (including field walking and metal detecting) to get more information.

I would like your support to do this.

**Change to the policy requested:**

**Respondent Number:** 5138 **Comment Number:** 1 **Respondent Name:** Jonathan Turner

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA22 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

The proposed encroachment onto Green Belt land for building, within an AONB and adjacent to a Scheduled Ancient Monument, is a shocking and wholly unacceptable suggestion, contravening as it does even the latest National Planning Policy Framework (NPPF 79-88) wherein such a proposal would be permitted only where “exceptional circumstances” can be proved to exist – there has been no suggestion that any such “exceptional circumstances” are in evidence in this instance. In fact, where designated heritage assets, such as Scheduled Ancient Monuments (ie the Wansdyke) are associated with the change, the Framework goes further, requiring “wholly exceptional circumstances” for such a change to be acceptable - this is very obviously not in point here. The proposed amendment to the Green Belt for the land adjoining Odd Down/Southstoke is therefore neither legally compliant nor sound, being in direct contravention of the National Planning Policy Framework.

Furthermore, the Council has long argued that Bath’s Green Belt acts as a de facto “Buffer Zone” for the Heritage City of Bath, in place of the formal “Buffer Zone” specifically required by UNESCO. When Bath was listed as a World Heritage Site in 1987, a cultural site of “outstanding universal value to the whole of humanity”, UNESCO specifically recognised the city’s unique “Landscape Setting” as being a key part of its importance. When the UK signed the 1972 UNESCO World Heritage Convention in 1984 it committed to protecting and conserving its World Heritage Sites for future generations. This proposal to encroach on the Green Belt, Bath’s “Landscape Setting”, for building, especially at a site so sensitive by virtue of it being within the AONB, the existence of its Heritage Assets, the South Stoke Conservation Area, and the wildlife concerns raised by the possibility of development, is in direct contradiction of that national commitment. The Green Belt, as the “Buffer Zone” for the World Heritage Site, must be kept intact in order to preserve the site as UNESCO requires.

In summary, the proposal to release land adjoining Odd Down from the Green Belt (policy B3A, CSA22) is not legally sound, being in contravention of the National Planning Policy Framework, and a wholly unacceptable breach of the UK’s requirements under the 1972 UNESCO World Heritage Convention. It makes a nonsense of the protections supposedly afforded by the AONB, the South Stoke Conservation Area, and the legislation regarding the protection of Scheduled Ancient Monuments. In fact it is difficult to see how a worse site could have been selected for development.

**Change to the policy requested:**

The proposal to release land adjoining Odd Down from the Green Belt (policy B3A, CSA22) should be wholly removed from the Core Strategy.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5142 **Comment Number:** 1 **Respondent Name:** John G. Price**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

INEVITABLE DAMAGE TO PROTECTED ANCIENT MONUMENTS AND WORLD HERITAGE SITE

I refer to the current proposals to allow land in very sensitive locations near Bath to be possibly developed in future years. As someone who resides some miles away from the world heritage site could I place observations to the Inspector that great importance should be placed on professional comments made by bodies such as English Heritage and other archaeological organisations.

I could take as an example the sad case of the great ancient Offa's Dyke along the Welsh Borders which was scheduled in 1934 and where it was reported in 1976 after surveys that at least two miles had disappeared without any recording. I believe further damage was reported this year. I put it to the Inspector that every effort must be provided to protect Ancient Monuments of national importance and placing housing estates of any quality near them will inevitably lead to damage in years to come.

**Change to the policy requested:****Respondent Number:** 5153 **Comment Number:** 1 **Respondent Name:** Ms Frances Mcleod**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

I am writing to state my strong objections to the Banes core strategy amendments.

Why is it necessary to build in the green belt, in an AONB, in a world heritage site, and adjacent to the ancient wansdyke, and which contravenes the latest national planning policy framework, unless exceptional circumstances can be proved to exist, which do not exist, ref. CSA/7, CSA/10, CSA/17, CSA/20, CSA/21, CSA/22 and CSA/23, Banes policy B3a and NPFF, clauses 79 & 88.

Why have Banes not got a defined buffer zone, when UNESCO require one, will Bath keep its world heritage status if this requirement is not met.

When any buildings are erected, the wildlife always suffers, and we cannot afford to lose any more habitats (ref.CSA 22/5 P.18.)

Please add these objections to all the numerous others you have received.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 5154 **Comment** 1 **Respondent** Mrs J K McPhee  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:****Support:** 

The proposal to build on the Green Belt/AONB would be a contravention of the National Planning Policy Framework which states that unless "exceptional circumstances" can be proved to exist they should not be permitted. Bath is situated in the midst of beautiful countryside that is part of its uniqueness. It would be a travesty to ignore these guidelines and build here, thus destroying the open space appreciated and enjoyed by local people and visitors. Bath as a World Heritage Site needs to be preserved in its entirety.

**Change to the policy requested:**

I would request that the proposal to build on the Green Belt / AONB adjacent to the Wansdyke and on the South Stoke Conservation Area be rejected as an inappropriate development.

**Respondent** 5156 **Comment** 1 **Respondent** Mrs Fiona Chivers  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:****Support:** 

I write to say that I am very unhappy about the proposed amendments to BANES Core Strategy. I feel it is quite wrong for home building to take place in a World Heritage Site buffer zone and I feel the whole matter has not been thought through correctly.

I sincerely hope that the whole idea will be scrapped

**Change to the policy requested:****Respondent** 5158 **Comment** 1 **Respondent** Derek H.W.Barber.  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA22 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:****Support:** 

I am surprised and saddened at the proposals to effectively extend Bath into the countryside by building a significant number of dwellings on the South Stoke plateau to which I object most heartily.

Bath- the whole of the city and not just the central- area is a World Heritage Site. The City's setting in the ring of hills with

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

the river Avon running through the centre is beautiful and travelling from the centre after passing through the surrounding suburbs, one reaches pleasant and largely undisturbed country side several hectares of which are proposed to be built over in South Stoke. Surely this is in direct conflict with the relevant provisions of the National Planning Policy Framework (clauses 79- 88).

Furthermore, Bath has no Buffer Zone to protect the World Heritage Site; instead it relies on the Green Belt but it seems where necessary the Green Belt can be sacrificed. What will happen after, say, 2025 when yet more housing may be needed?

A section of the Wansdyke fringes the Northern boundary of the area in question. It is a Scheduled Ancient Monument with all the protections that such designation attaches to it. I assume that any building would be pulled back from this feature just as has been done at Sulis Meadows but as there is precious little of this feature left, to me it is unthinkable to risk damaging any more of it by close proximity building.

The subject land is also part of the Cotswold Area of Outstanding Beauty. When the Area was extended a few years ago, the South Stoke Plateau was included presumably for the very good reason that it was considered justifiable by the planning experts of the time. It is now proposed to damage a part the Area by high density building; this must be wrong.

I also note from the Concept Plan covering the area in question, there is an innocuous note about a "potential access from South Stoke Lane". There exists a private drive way along the North Boundary of Brantwood that gives access to some workshops. The implication is that at some future date, perhaps when any development is well advanced, this "potential access" might become a public vehicular access which would turn the presently narrow South Stoke Lane into a busy local road which it is not designed to be.

If the development must proceed, it would surely be possible for it to do so only after all other sites in Bath have been built over including the three former MOD sites.

**Change to the policy requested:**

### Change Reference: CSA23 Land adjoining Odd Down

**Respondent Number:** 246    **Comment Number:** 13    **Respondent Name:**    **Respondent Organisation:** Combe Hay Parish Council

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA23 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

**Change to the policy requested:**

Delete the Concept Diagram relating to the Land Adjoining Odd Down.

**Respondent Number:** 279    **Comment Number:** 1    **Respondent Name:** Rohan Torkildsen

**Respondent Organisation:** English Heritage

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

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Thank you providing English Heritage the opportunity to comment on the proposed defined boundaries of the five strategic housing site allocations, the Green Belt boundary changes and the alternative site and boundary options.

This correspondence supplements our letter to you of 8 May 2013.

Change ref: CSA23 Strategic Allocation Odd Down/South Stoke

The key heritage assets affected are the World Heritage Site and the Wansdyke.

**Bath World Heritage Site**

The assessments undertaken inform a proposal where the location for development and the Placemaking Principles would help to ensure the Outstanding Universal Value of the World Heritage Site is maintained.

**Wansdyke Scheduled Monument**

The open arable landscape to the south of the Wansdyke is a component of its setting and makes a positive contribution to its significance. The proposed allocation will change this relationship. The extent and form of this change to the setting will affect the degree of harm to the Wansdyke's significance.

The surroundings in which the Wansdyke is experienced has been assessed and it is evident that substantial harm to the significance of the Wansdyke would arise if an open landscape area to the south of the Wansdyke (Area D, the field adjacent to the Wansdyke and Sulis Meadows) were developed.

The extent, location and form of development must be carefully planned and I would suggest that the following would help to ensure the significance of the Wansdyke is conserved:

- the proposed retention of fields adjacent to South Stoke Lane and the Wansdyke;
- the mitigation set out in the Placemaking Principles (as amended see below);
- ideally Option B2 would be applied omitting Area D (the field adjacent to the Wansdyke and Sulis Meadows) as evidence demonstrates that substantial harm would be caused to the significance of the Wansdyke if development were located here, contrary to the NPPF. However I do recognise that:
  - Area D may not perform strongly in Green Belt terms and the NPPF provides policy to conserve heritage assets;
  - amended Placemaking Principles would require that proposals conserve the significance of the Wansdyke, and;
  - that a further more detailed finer grained assessment may inform the consideration of 'open uses' such as recreational uses (but not structures e.g. changing rooms and pavilion) which retain the important open landscape character.

**Change to the policy requested:****Respondent Number:** 1525 **Comment Number:** 4 **Respondent Name:****Respondent Organisation:** South Stoke Parish Council**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA23 Land adjoining Odd Down**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

CSA/23.  
The 'Concept Diagram' Annex 1 is not site specific as requested by the Inspector in his note I/D 40 but shows a slightly less general area of the Plateau on which houses might be built, if the Green Belt is to be extended. It seeks to give 'general' guidance to 'Avoid Harm' to the Wansdyke and WHS but ignores the very important Setting of South Stoke Conservation

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

Area. The only way to avoid such harm is to remove unnecessary land from this 'Concept Area'.

In addition there is an area shaded in, which extends across an open paddock (once South Stoke cricket pitch) right down to the 'Grove' footpath, the 'Millennium Viewpoint' and the 'Queen's Silver Jubilee Seat', which is only 5 metres away from the Conservation Area Boundary. In the text this is referred to as potential Employment Land. There are strict rules set out in the NPPF for re-use of otherwise redundant buildings in the Green Belt. Seeking to pre-empt the proper process in this way is unacceptable.

As already noted under previous headings the note referring to a 'Potential Access' from South Stoke Lane should be removed.

**Change to the policy requested:**

South Stoke Parish Council accepts that if conclusive evidence is provided that proves that a development of this nature must be permitted, then it should only be allowed to the West of the Eastern Boundary of Sulis Manor.

The Parish Council therefore asks that in this event CSA/23 & 24 should be revised accordingly.

**Respondent Number:** 2012 **Comment Number:** 3 **Respondent Name:** Steven Gourley

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA23 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

On the concept map for land adjoining Odd Down, the land around the farm buildings in Manor Farm in South Stoke is shaded in a dark brown colour not described in the associated legend. This seems to suggest that all of this land is of equal status, and yet some of it (the old village cricket pitch) has never been developed. The meaning of this shading should be clarified.

I believe this to be an example of a comment on changes that I understand are too detailed for consideration by the inspector. So will this comment be considered by B&NES? The terms of the consultation seem to indicate that they will not.

My concern is that this consultation has the appearance of a democratic process but there are gaps that would result in aspects of the plan being not consulted on. This would reduce the quality and soundness of the overall plan.

**Change to the policy requested:**

The dark brown shading around Manor Farm should be removed from the diagram.

**Respondent Number:** 2565 **Comment Number:** 3 **Respondent Name:** Andrew Bolden

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA23 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

The concept map in Annex 1 (page 57) shows land shaded just west of the property Brantwood which is outside the proposed Green Belt. Although part of this land is used for employment the remainder is open field. This shaded area is

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

given no explanation on the plan but increased access hints at proposals for development. Such development must necessarily be prohibited as it is Green Belt and AONB

**Change to the policy requested:**

The Core Strategy should not include altered Green Belt boundaries which require land greater than to meet the stated aim – even the area shown is more than twice that required to meet the Councils’ stated aim of 300 houses .

**Respondent Number:** 4454 **Comment Number:** 1 **Respondent Name:** C G Britt

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA23 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

The amendments show a potential access road to the new site via the Cross Keys junction and South Stoke Lane. Though this is an improvement on the original of main access from the Cross Keys junction, it still allows for a potential increase of traffic at this already busy junction. It could also lead to there being a new “rat run” from Midford Road to the Park and Ride area/Main A367. I think all access should be from the A367. This would also help to maintain the character of South Stoke as a distinct village.

Access from South Stoke could also open up further encroachment upon the green belt land in the future. It is disgraceful that such a large area of green belt land is considered suitable for building, when there a brown field sites available, so any future increases should be clearly discouraged now.

**Change to the policy requested:**

Delete reference to a potential access road from the South Stoke Lane.

**Respondent Number:** 4683 **Comment Number:** 2 **Respondent Name:** Christina Sandford

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA23 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

Transport

CSA 23 shows "potential vehicle access" along Southstoke Lane, which cannot support increased traffic. Further development at Manor Farm will increase the load along the lane anyway. Widening this road and the access past Brantwood and changing the junction at the Cross Keys would urbanise the only part of the plateau land which it is proposed should remain within the Green Belt.

**Change to the policy requested:**

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**Respondent Number:** 4942 **Comment Number:** 1 **Respondent Name:** Peter Houston

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA23 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I strongly object to CSA23 as currently designed as it encroaches on the integrity of South Stoke village.

It also abutts the Wansdyke, and is an Area of Outstanding Natural Beauty.

**Change to the policy requested:**

I would be prepared to support development which would be limited to the area between Combe Hay Road and the eastern boundaries of Sulis Manor.

**Respondent Number:** 5024 **Comment Number:** 1 **Respondent Name:** Adrian Shields

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA23 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Green Belt/AONB

Building in the Green Belt , AONB , setting of the world heritage site and adjacent to the Wansdyke is wrong and contravenes even the latest National Planning Policy Framework unless 'exceptional circumstances' can be proved to exist, or in the case of Heritage assets ( Scheduled Ancient Monuments) "wholly exceptional circumstances"  
Reference CSA/7 . CSA/10 , CSA/17 , CSA/20 , CSA/21 , CSA / 22 and CSA/23 . BANES Policy B3a &NPFF clauses 79 - 88

**Change to the policy requested:**

**Respondent Number:** 5085 **Comment Number:** 5 **Respondent Name:** Diana Hopkins

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA23 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The Green Belt diagram (CSA23) shows a 'potential access road' to the new development along the northern boundary of Brantwood to Southstoke Lane. This is not possible, as it is a single track road and cannot support any further traffic.

**Change to the policy requested:**

The Odd Down/South Stoke development plan must be removed from the Core Strategy.

**Change Reference: CSA24 Land adjoining Odd Down**

**Respondent Number:** 102 **Comment Number:** 1 **Respondent Name:**

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

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA24 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

FoBRA attended the drop-in event on green belt land needed for housing. It concluded that, if the Council is to get its Core Strategy approved (and this is most important or else it will be open to "hijacking" as is happening at Saltford), it seems inevitable that some extension into the green belt must be offered. The sites that have been identified appear to be relatively small and to have been arrived at through a sensitive and fair process. At Odd Down, this is a much less visible option than the Duchy land at Twerton Fork/Newton St Loe, and it is already partially built-up (eg Sulis Meadows). Care has been taken to respect the Wansdyke, South Stoke and the view from the Midford Valley below. However, the area enclosed by the proposed new Green Belt Boundaries is sufficient for between 650 and 700 houses at adjacent "Sulis Meadows" density. Why is it necessary to take so much from the Green Belt now? FoBRA feels that, if more housing land is needed there in future, a second application should be made, providing the public with the opportunity to express their views at the right time. A reduction in the area taken now would help to avoid encroachment on South Stoke.

**Change to the policy requested:**

Reduction in the area of Green Belt to be taken now, or explanation for the large area sought.

**Respondent Number:** 246 **Comment Number:** 14 **Respondent Name:**

**Respondent Organisation:** Combe Hay Parish Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA24 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

**Change to the policy requested:**

Delete the Policies Map relating to the Land Adjoining Odd Down.

**Respondent Number:** 1206 **Comment Number:** 3 **Respondent Name:**

**Respondent Organisation:** Freshford Parish Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA24 Land adjoining Odd Down

**Location:** Land adjoining Odd Down

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

The movement of the Green Belt boundary so near to the South Stoke Conservation Area is alarming. Development so close together with the possibility of new accesses from South Stoke Lane needs more than 'minimising' to avoid lasting harm.

**Change to the policy requested:**

The extension of the strategic site towards the South Stoke CA should be drawn back so that the distance between the edge of each is doubled at the very least.

**Respondent Number:** 5032 **Comment Number:** 2 **Respondent Name:** Anne Ward

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA24 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**Support: 

Re potential access from Southstoke Lane. This is a narrow road, single track in some places. There is a narrow footpath on the western edge, no path on the eastern edge where the houses are situated. There is no street lighting along the length of the lane between the Frome road and the entrance to the village. The western boundary is made up by a mature hedgerow, trees have been planted in the field beyond this. I cant see how access can be obtained via this route without disruption/removal of all the existing structures and landscape which is contrary to the stated intention of the core strategy. For these reasons I consider this proposal inconsistent with achieving sustainable development, unreasonable and incompatible with NPPF.

**Change to the policy requested:**

I support removing the possible development of site access from Southstoke Lane.

**Respondent Number:** 5085 **Comment Number:** 4 **Respondent Name:** Diana Hopkins

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA24 Land adjoining Odd Down

**Location:**

**Comment made on the Proposed Change:**Support: 

The area proposed by the changes to the Green Belt Boundary is far bigger than the area needed for the proposed 300 dwellings. Such a large area is NOT needed and the Green Belt should not be changed in this way.(Ref CSA/22 and the green belt diagram CSA23 and Annex 1 page 57).

**Change to the policy requested:**

The Odd Down/South Stoke development plan must be removed from the Core Strategy.

**Respondent Number:** 5085 **Comment Number:** 6 **Respondent Name:** Diana Hopkins

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA24 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

The shaded area on the map by the Manor Farm buildings suggests development for 'employment purposes'. This area falls entirely within the Green Belt and is therefore subject to the restrictions set out in the NPPF (clause 89). Any further development of these buildings and changes of use in this location (right on the edge of the plateau) would be seriously detrimental to the Green Belt, AONB, World Heritage Site (in particular, with the clear visibility of such a development from areas to the south of Bath).

**Change to the policy requested:**

The Odd Down/South Stoke development plan must be removed from the Core Strategy.

**Respondent Number:** 5093 **Comment Number:** 1 **Respondent Name:** Heidi Payne**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA24 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: 

My husband and I support the changes that remove some of the South Stoke Plateau from the SSA. However the changes do not go far enough. None of the South Stoke Plateau should be removed from the Green Belt. The plateau is part of the Cotswolds AONB and it is essential that it remain Green Belt to limit creeping urbanisation and to protect the WHS status of Bath. We find fiddling with the Green Belt boundaries just because it's "convenient" is simply unacceptable. Build on the Brown Field sites! And do it first!

**Change to the policy requested:****Respondent Number:** 5110 **Comment Number:** 2 **Respondent Name:** Nicolas Alexander**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA24 Land adjoining Odd Down**Location:****Comment made on the Proposed Change:**Support: **Change to the policy requested:**

The north-easternmost and south-easternmost fields proposed to be removed from the Green Belt should remain within the Green Belt.

**Change Reference:** CSA25 Land adjoining Weston (General)

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 93 **Comment** 3 **Respondent** Highways Agency  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:** Land adjoining Weston (General)**Comment made on the Proposed Change:**Support: 

The site-specific placemaking principles in respect of transport are broadly supported. It is not however clear in what ways the development is supposed to 'support existing public transport provision'. Is this a reference to financial contributions, or some other means of support ?

**Change to the policy requested:****Respondent** 278 **Comment** 2 **Respondent**  
**Number:** **Number:** **Name:****Respondent** Cotswold Conservation  
**Organisation:** Board**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:** Land adjoining Weston (General)**Comment made on the Proposed Change:**Support: 

1. Paragraph 14 of the National Planning Policy Framework (NPPF) includes: "For plan-making this means that:  
● local planning authorities should positively seek opportunities to meet the development needs of their area;  
● Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as whole; or specific policies in this Framework indicate development should be restricted.9"

Footnote 9 states: "9 For example, those policies relating to ... an Area of Outstanding Natural Beauty..."

2. NPPF paragraph 47 includes: "47. To boost significantly the supply of housing, local planning authorities should:  
● use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as 1 Section 87, Countryside and Rights of Way Act 2000. far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;"

3. NPPF paragraph 115 states:

"115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads."

4. NPPF paragraph 116 states:

116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

● the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which that could be moderated.

5. Thus NPPF paragraphs 115 and 116 make clear that development within an Area of Outstanding Natural Beauty may be restricted, and that “exceptional circumstances” need to be demonstrated if planning permission is to be granted for major development in these areas. It is clear therefore that where policies within the NPPF restrict development, then the “full, objectively assessed needs for market and affordable housing in the housing market area,” may not be able to be met.

6. Since the sites under consideration in the proposed Core Strategy amendments are “strategic allocations”, they clearly represent “major development” in relation to paragraph 116 and must comply with the policy set out in that paragraph.

7. This was also confirmed by the Inspector examining the Wealden District Core Strategy, Michael Moore BA (Hons) MRTPI CMILT MCIHT, when, in his proposed modifications dated 5th March 2012, he deleted the only housing allocation within the High Weald AONB for around 160 dwellings for the following reason:

“26. PPS7 indicates that the conservation of the natural beauty of the landscape and countryside should be given great weight in planning policies for AONBs.

Major developments should not take place in these designated areas except in exceptional circumstances and should be subject to the most rigorous examination. They should be demonstrated to be in the public interest. The Council considers that in PPS7 terms the SDA would constitute a minor development. However, AONBs are areas of countryside and attractive landscape. In this context, a residential development of the scale proposed, considered by the Council to be a strategic provision, must be regarded as major. While the criteria for consideration of major development in para 22 of PPS7 are expressed in terms of applying to planning applications they must logically also relate to proposals in plans.”  
[Board’s italics]

18. We see that the criteria set out in paragraph 22 of the former PPS 7 are essentially repeated in paragraph 116 of the NPPF. One of the criteria to be assessed is “the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way”.

19. This issue was addressed by the Inspector reporting to the Secretary of State for his decision on the Highfield Farm, Tetbury appeal (APP/F1610/A/11/2165778):

Conclusions in respect of paragraph 116 of the Framework

14.69 ... But importantly, in terms of the harm that would be caused to the AONB, I have not been provided with any evidence to suggest that there is anything other than very limited scope indeed to provide housing within the District on sites that are not part of the AONB. [Boards italics]

The Secretary of State concurred with the Inspector: The cost of, and scope for, developing elsewhere

20. The Secretary of State agrees that it is preferable for development to be accommodated on previously-developed land (IR14.51); but there is no evidence to indicate that the remaining shortfall could be addressed solely through the use of previously developed sites. He notes that the Inspector found no evidence of anything other than very limited scope to provide housing on sites outside the AONB (IR14.52). Although preliminary work on the Core Strategy Second Issues and Options Paper identifies a potential strategic site at Cirencester, outside the AONB (IR8.33), he attributes limited weight to this due to the early stage of plan preparation.

20 We conclude that the Secretary of State considers that there should be consideration of the scope for developing sites within the District but outside the AONB before releasing major development sites inside. We note that the BANES

SHLAA (November 2013) indicates that there is considerable scope for development within the District but outside the AONB. Examples are as follows:

Land in the Green Belt to the SE of Bristol

Paragraph 2.53 of the SHLAA summary considers a site at Hicks Gate. It states:

“The potential of the area (within BANES) is at least from 650 and rises to 1200 if a greater level of environmental impact and Green Belt intrusion is accepted. It is the impact on the Green Belt and the separation of Bristol, Keynsham and Bath that is the key issue here. This is perhaps the most sensitive area of Green Belt in BANES. The impact on the highways network is also of concern with traffic already backing up along the A4 through Brislington.”

Paragraph 2.54 of the SHLAA summary considers a site at Whitchurch. It states:

“The report (Development Concept Options Report) concludes that if all the area is available for development then 3000 dwellings could be forthcoming. If the majority of Horseworld is removed from the equation then the capacity of the area is unlikely to exceed 2000. Significantly less than this is currently deliverable in the absence of major highway improvements. Barton Willmore suggest a first phase of 600 could come forward without such improvements.

21.The Board therefore suggests that even the minimum potential development at these two sites would provide an additional 1250 dwellings, comfortably exceeding the numbers proposed to be provided from the AONB sites at Weston and Odd Down to meet the suggested shortfall in housing numbers for the Council area as a whole.

23. With respect to the description in the SHLAA of the importance of the Green Belt at Hicks Gate, the Board would suggest that the landscape of the Green Belt at Odd Down and Weston is considerably more sensitive, being designated as part of an AONB and forming part of the setting of a World Heritage Site: as stated in NPPF paragraph 115, AONBs have the highest status with respect to protection in relation to landscape and scenic beauty.

24. However, the Board regards the availability and merits of land to the south-east of Bristol as informative rather than decisive. It would remind the Council that, whether or not there is land elsewhere which can be identified for development, §116 of the National Planning Policy Framework still requires a presumption against development in an AONB unless exceptional circumstances can be demonstrated. There may well be cases where (§5 above) as a result of policies within the NPPF restricting development, the “full, objectively assessed needs for market and affordable housing in the housing market area” cannot be met.

**Change to the policy requested:**

<b>Respondent Number:</b> 279	<b>Comment Number:</b> 3	<b>Respondent Name:</b> Rohan Torkildsen	<b>Respondent Organisation:</b> English Heritage
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>		<b>Attachments sent with the comment?</b> <input type="checkbox"/>	

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

Support:

Change ref: CSA25 Strategic Allocation Weston Placemaking Principles  
Placemaking Principal 7, “Development causing substantial harm...should be avoided”. Unfortunately this fails to recognise policy in the NPPF (paragraph 132-134) which emphasises that “great weight should be given to the assets conservation . The more important the asset, the greater the weight should be.”

World Heritage Sites are of the “highest significance” and “any harm should require clear and convincing justification.”

At present this Placemaking Principal would fail to ensure that great weight is afforded to the conservation of the World Heritage Site, merely protection from substantial harm.

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To accord with the NPPF this Placemaking Principal no.7 could be modified as follows "Development should ensure the conservation of the significance of affected heritage assets..."

**Respondent Number:** 811 **Comment Number:** 4 **Respondent Name:** Mary Walsh, Jill Britten

**Respondent Organisation:** WHITCHURCH VILLAGE ACTION GROUP

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**Support: 

We would further draw your attention to the fact that the village has been called the derogatory "edge of Bristol" name with RA5 status with the extraordinary figure of 200 houses dumped here.

We would like to see the proposed housing figure of 200 reduced to say 50-100 to be in line with all the other villages of RA1 status so that this village has not been discriminated against. There is no justification for dumping 200 houses on Whitchurch Village and not on say, Clutton, Bishop Sutton, Temple Cloud or wherever. Any shortfall in housing figures caused through removal of the 200 to say 50/100 houses could be made up by offering smaller villages the chance to have small development thus allowing these little villages a chance for some regeneration and allow them to "live".

**Change to the policy requested:**

We have as

**Respondent Number:** 837 **Comment Number:** 4 **Respondent Name:** David Redgewell

**Respondent Organisation:** South West Transport Network Railfuture

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**Support: 

Policy B3B land at Weston Bath. We wish to see changes to the planning of this site to provide more houses at affordable rates. The World Heritage site is being used as constraint on development.

**Change to the policy requested:**

The text change to include options for further affordable housing due to its good location to Bus Station to Central Bath and the railway station.

**Respondent Number:** 2611 **Comment Number:** 2 **Respondent Name:**

**Respondent Organisation:** Transition Bath

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

Transition Bath strongly supports the proposed Sustainable Construction Standards at all the sites. We feel that building to these higher standards will reduce future carbon emissions, occupiers' exposure to rising fuel costs and their volatility, reduce fuel poverty and overall is a very sensible economic policy.

The monetised energy savings to home owners easily offset the additional capital costs, which are not borne by the developers but by the sellers of the land. Recent land sales of greenfield and brownfield sites in Bath at £1.9M and £2.5M per hectare are significantly above the government's viability benchmark levels of £300K and £800K per hectare suggest that the additional capital costs of between £6.5K and £10.5K (ref 1) of building to Code for Sustainable Homes 5 which have significantly reduced in the last few years will not act as a barrier to land being brought forward for development.

A recent survey by Curo for the redevelopment of the ex-MOD site at Foxhill in Bath where 700 homes are to be built put Sustainable Low Energy homes as the second top priority for local residents after Affordable Homes; we feel the requirement for building homes more sustainably is backed by the majority of B&NES residents.

Ref 1: [http://www.brighton-hove.gov.uk/sites/brighton-](http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/EP059%20Costs%20of%20building%20to%20the%20Code%20for%20Sustainable%20Homes%20(Sept%202013)%20(draft).pdf)

[hove.gov.uk/files/EP059%20Costs%20of%20building%20to%20the%20Code%20for%20Sustainable%20Homes%20\(Sept%202013\)%20\(draft\).pdf](http://www.brighton-hove.gov.uk/files/EP059%20Costs%20of%20building%20to%20the%20Code%20for%20Sustainable%20Homes%20(Sept%202013)%20(draft).pdf)

**Change to the policy requested:**


**Respondent Number:** 2847 **Comment Number:** 1 **Respondent Name:** Trevor Dawson

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**Support: 

These Green Belt sites next to Weston fall within the Bath World Heritage Site and the Cotswolds Area of Outstanding Natural Beauty (AONB), and are overlooked by the Beckford's Tower.

I acknowledge the need for new housing both nationally and locally, but I am concerned that Green Belt land should only be developed as a last resort. I am particularly concerned by the lack of robust assessment of alternative sites, considering that planning has been turned down on less obtrusive, non Green Belt sites in other areas in B&NES. We know that estimates by planners for housing in the Weston Green Belt have consistently been shifted downwards, from an original 1000 homes to 300 homes to now a possible 150 homes: we would urge planners to rethink their numbers further, so that no irreplaceable Green Belt land would have to be lost to development as part of the Core Strategy.

Housing development on Green Belt land is inconsistent with Section 9 of the National Planning Policy Framework which serves to protect Green Belt land. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness and permanence. The identified sites in Weston satisfy important roles of Green Belt land, as set out in the NPPF, including: (i) checking urban sprawl, (ii) safeguarding countryside from encroachment, (iii) preserving the setting and special character of historic towns.

There are also problems with the proposal based on grounds of sustainability: building homes in the outer reaches of Upper Weston would promote car-dependency (the sites are remote from amenities, and offer poor pedestrian and cycling routes along Lansdown Lane, with its steep gradient and lack of protection from heavy commuter traffic). Housing development on these identified sites would build on protected hillside within an Area of Outstanding Natural Beauty, and would have a strong visual impact on the skyline and landscape of this World Heritage city.

There are moves by landowners in this area to extend the conservation and award winning Primrose Hill Community

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

Woodland by the essential addition of shrub covered fields and wild flower meadows, thus maximising the potential for bio-diversity in the area which in combination with the sensitive farm management will turn these slopes into a unique and valuable wildlife habitat and increase its status as an area of special scientific interest.

**Change to the policy requested:**

**Respondent Number:** 3095 **Comment Number:** 3 **Respondent Name:**

**Respondent Organisation:** CPRE Avonside

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

**Support:**

Weston  
We feel that the current proposal does not include sufficient detail to ensure that the damage to landscape and to the purposes of Green Belt is minimised.

**Change to the policy requested:**

Weston  
As with the land adjoining Southstoke, we would like to see clearer direction as to the number and location of houses. Once land has been removed from Green Belt, it is all too easy to envisage a gradual process, the end result of which is that all of that land is developed. An indicative housing boundary should be laid down at the plan-making stage, and should be given planning weight at the Placemaking Plan stage.

**Respondent Number:** 4448 **Comment Number:** 1 **Respondent Name:** Andrew Heath

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

**Support:**

Bath is located in one of the most intensely landslipped areas in Britain (Kellaway & Taylor, 1968) and the proposed site in Weston lies within an area where the geomorphology is consistent with landsliding and where hazard maps show extensive landsliding and cambering have occurred (Forster et al. 1987; Hobbs & Jenkins, 2008). There have been a number of landslide related deaths in Bath, most notably from those initiated by the construction of Camden Crescent in the 18th century. Unlike in the 18th century, we now have the knowledge and tools to assess landslide hazard before development and this should be undertaken. The sites chosen for the "Land Adjoining Weston" site are at high risk of landslipping, and one of the sites is characterised by a major pre-existing landslide on the British Geological Survey (BGS) map of the area. Constructing in this area is likely to be very expensive and could remobilise the landslide leading to damage to adjacent existing buildings.

Planning Policy Guidance 14: Development on Unstable Land states "the approach that local planning authorities should follow in dealing with land instability issues in their development plans. It may be appropriate, where the relevant information is available, to identify any specific areas where particular consideration of landsliding or the potential for landsliding will be needed" (HM Government, 1996). There is no evidence in the core strategy that this has been done and the term "landslide" or its derivatives were not present in the original core strategy document. In the amendments they have identified some areas that were previously under consideration as at risk of landslides, but this has not been done

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

for all areas.

Research into landslide hazard and associated costs in the UK has concluded “Planning guidance for geohazards including landslides exists (though its application may be inconsistent)” (as demonstrated with the BathNES core strategy), and there is “a position of perceived safety that we consider to have potentially serious social and economic implications” (Gibson et al, 2012). This is contrary to the government housing strategy which states that “Successful new homes and neighbourhoods also offer durability – being long-lasting, yet economical to manage and maintain – ensuring good returns on investment.” (HM Government, 2011).

The information provided above demonstrates that the BathNES core strategy is not positively prepared, is not effective and is not consistent with national policy and cannot therefore be considered sound.

References cited:

Forster, A; Hobbs, P.R.N.; Wyatt, R.J. & Entwisle, D.C. 1987. Environmental geology maps of Bath and the surrounding area for engineers and planners. Planning and Engineering Geology. Geological Society, Engineering Geology Special Publication no. 4, pp 221-235

Gibson, A; Culshaw, M; Dashwood, C & Pennington, C 2012. Landslide management in the UK—the problem of managing hazards in a ‘low-risk’ environment. Landslides, August 2012. DOI 10.1007/s10346-012-0346-4

Hobbs, P.R.N.; Jenkins, G.O. 2008 Bath's 'foundered strata' : a re-interpretation. British Geological Survey, 19pp. (OR/08/052)

HM Government, 1996 Planning Policy Guidance 14: Development on Unstable Land - Annex 1: Landslides and Planning, ISBN: 0 11 753259 2

HM Government, 2011, Laying the foundations: a housing strategy for England. A new strategy to unblock the housing market and get the nation building again. ISBN 9781409832348

Kellaway, G. A. & Taylor, J. H. 1968. The influence of landslipping on the development of the City of Bath, England. Proc. 23rd Int. Geol. Conf. 12, 65–76.

**Change to the policy requested:**

**Respondent Number:** 4472 **Comment Number:** 1 **Respondent Name:** R.J .Cook

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Use of green belt land in Weston would ruin the views of our Heritage City.

**Change to the policy requested:**

Delete the proposals to use green belt land in Weston.

**Respondent Number:** 4517 **Comment Number:** 1 **Respondent Name:** Mrs Hayward

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

The amendment is not sound as it plans to build houses on designated green field sites which under national policy Section 9 of the National Planning Policy Framework (NPPF) protects green belt land. I do not agree with these amendments which contravenes this policy.

Furthermore it will ruin the hills and skyline of this area of outstanding national beauty (AOND). The impact on the village of Weston will be catastrophic and will cause traffic and road congestions as a result.

**Change to the policy requested:**

Not building on the cited fields.

**Respondent Number:** 4532 **Comment Number:** 1 **Respondent Name:**

**Respondent Organisation:**

**Agent ID:** 36 **Agent Name:** The Silverwood Partnership

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**Support: 

## 1. Introduction

1.1 We have been instructed by The Silverwood Partnership in respect of the Core Strategy Consultation which has identified a number of strategic sites for development in order to assist in meeting its housing provision in the period up to 2028. Our client has interest in land at:

- i. Heather Farm off Lansdown Lane, Weston, Bath
- ii. Land off Eastfield Avenue, Weston, Bath

1.2 The extent of their control is shown in red hatch on the attached plans. However, at the outset we can advise that they have been in discussion with the landowners/developers of the remainder of these sites which are all identified under Policy B3A and agreement is in place with regards the delivery of these sites in accordance with the criteria in Policy B3A.

## 2. Current Planning Policy Position

2.1 The proposal for a revised number of homes as part of BANES' Core Strategy was approved by BaNES Council on 4th March 2013.

2.2 In addition to the land proposed for new homes within the previous draft Core Strategy, the Council agreed to the expansion of Bath at Weston Slopes by way of removal of the Green Belt to accommodate a total of 300 dwellings.

2.3 At that point there was no defined allocation, however a number of studies have been undertaken to establish the key parameters affecting each parcel's development.

2.4 Therefore we aim to draw upon the available examination documents commissioned by BANES to evidence the case for development of the land at Weston.

2.5 We have engaged with the BANES Planning Policy Team, who are also actively progressing additional supporting material at this time.

2.6 The following recent evidence base has been reviewed in preparation of this submission.

- Bat Walkover Survey and Assessment Report – Weston Slopes, Bat Pro Ltd (February 2013).
- Transport Evaluation, Ove Arup & Partners Limited (February 2013).
- SHLAA Report of Findings (March 2013) Appendix 1b: Bath Green Belt. Weston Slopes (North) (Reference A3i).
- Visual Impact Study, Ove Arup & Partners Limited (April 2013).

- Bath & North East Somerset Green Belt Review, Stage 1 Report, Ove Arup & Partners Limited (April 2013).
- Lower Slopes at Weston, Development Options Concept Report (DOC), Ove Arup & Partners Limited (April 2013).
- Preliminary Ecological Surveys and Assessment, Bristol Regional Environmental Records Centre (BRERC) (June 2013).
- Bath & North East Somerset Green Belt Review: Report on Additions to the Green Belt, Ove Arup & Partners Limited (August 2013).

2.7 The above analysis provides a vital backdrop to development on Weston Slopes and strengthens the case for continued allocation and the release from the Green Belt as part of the Core Strategy.

### 3. Landscape, Visual Aspects and Heritage Setting

3.1 The land is subject to a number of designations including: -

- Cotswold AONB
- Green Belt
- Bath World Heritage Site
- Bath World Heritage Site Setting

3.2 The land falls outside of the Bath Conservation Area.

3.3 Due to the sloping nature of the site, the central depression in the landform and boundary vegetation, the visual impact upon the surrounding and wider geographical area is naturally mitigated. Through careful design including retention and enhancement of these features we consider that a transition between urban and rural can be well managed and maintained.

3.4 This is confirmed by the recent Arup Development Options Concept report, indicating a theoretical 'Visual Impact Tide Mark' along the northern boundary of the land as detailed below. This report builds upon the Visual Impact Study also undertaken by Arup in April 2013.

3.5 As such the land located to the south under our client's control would appear to fall below this indicative tide mark and thus in principle making it suitable for development.

### 4. Nature Conservation and Ecology

4.1 According to the initial Bat Survey undertaken by Bat Pro in February 2013, the subject land was included within Zone 1 of the study.

4.2 The survey concluded that land in the lower slopes may yield the potential for Greater Horseshoe Bats.

4.3 Given the nature of this initial preliminary work, Bat Pro recommended further analysis, by way of additional Dusk Surveys.

4.4 Further Bat studies would be provided as part of any planning application, the results of which would assist in ensuring Bat mitigation where necessary.

4.5 We have also had sight of the Preliminary Ecological Surveys and Assessment Report undertaken by BRERC.

4.6 This concludes that the land comprises 'Improved Grassland'.

4.7 Hedgerows bounding the Principle Development Area have 6 or fewer important Wooded Species. Hedgerows with 7 or more wooded Species qualify as 'important hedgerows', under the Hedgerow Regulations 1997.

4.8 Figure 5 of the BRERC report details a number of features suggested to be retained within the Weston Slopes study area. No retained features are suggested affecting land under our client's control.

4.9 In a wider context the land to the immediate north of the Principle Development Area benefits from a hedgerow, crossing north and then to the west which is considered an 'important hedgerow' and should be retained.

4.10 Further north west there are two additional features worthy of retention. Both of these comprise of recently

established broad-leaved woodland and potentially considered as a Lowland Mixed Deciduous Woodland Priority Habitat.

4.11 Should the wider land holding be suitable for development these features could be retained as an integral part of the development.

#### 5. Transport and Connectivity

5.1 Main access is gained off Lansdown Lane, connecting Weston to the Lansdown plateau. It is proposed that development will be accessed off Lansdown Lane, by way of demolition of Heather Grange. Access to the other parcels would be off Lansdown Lane and Eastfield Avenue respectively.

5.2 We have had sight of the Core Strategy Transport Evaluation (February 2013), which concludes: -  
“The land adjoining Weston and Land adjoining Odd Down perform well across all categories and are considered the two best performing areas for future development. They are well located to take account of sustainable transport opportunities and there are opportunities to mitigate highway impact through modal shift, park and ride and local highway capacity improvements. Both are located in areas with existing neighbourhood facilities and in wards which have an established sustainable travel culture.”

5.3 Noting the above conclusion, Weston Slopes is one of the most appropriate locations for growth of those areas studied in and around Bath. It is our opinion that the future delivery of housing should therefore be focused and prioritised in this area.

#### 6. Suitability, Sustainability and Deliverability

6.1 The agreed Weston Slopes growth point is an area reviewed in detail by Ove Arup and Partners as part of their DOC Report (April 2013).

6.2 Our client’s land and that adjoining forms part of the most suitable, sustainable and deliverable within the Weston Slopes area of study.

6.3 Based upon the due diligence undertaken to date, the land benefits from immediate highways access, an accommodating local transport network, developable topography, limited ecological constraints and development is assessed to have minimal visual impact upon the Heritage setting (subject to mitigation through design).

6.4 The land is located adjacent to an established residential area, therefore benefitting from a close proximity to a range of local amenities including Weston All Saints C.E. Primary School and a local shopping precinct, alongside a frequent public transport service.

6.5 The land also abuts existing residential development in the form of the most recent addition to the post war development in Weston. Development would therefore provide a natural extension to this and will seek to positively enhance the overall setting through high quality design.

#### 7. Availability and Timescales

7.1 We can confirm that the land is available immediately for development and they wish to progress with applications as soon as practically possible.

7.2 It is our assessment that the Principle Development Area may yield in the order of 130- 150 dwellings. This broadly concurs with the Arup DOC Report (April 2013). Without intrusive investigation and detailed design it is not however possible to provide accuracy in this respect.

7.3 Due to the existing highways access and the self containment of the site it is assumed that housing could be delivered within a short time frame and within the first 5 years of the adopted Core Strategy.

#### 8. Green Belt Release

8.1 Our client wishes to express their strong support of the allocation of their land for development and removal from the Green Belt as part of the Core Strategy, rather than allocation as part of the Placemaking Plan.

8.2 Given the clear restrictions on available development land in suitable locations, notably within Bath, Green Belt

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release is inevitable to ensure the continued prosperity of the Local Authority area.

8.3 With regard to Green Belt boundaries, Paragraphs 83 of the NPPF states that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The most significant element of this process is now drawing to a close.

8.4 BANES took the decision to release land in the Weston area from the Green Belt in March 2013. However when making that decision, the Council did not have the benefit of the evidence base which has since been produced.

8.5 In light of the significant volume of evidence available in respect of Weston Slopes we believe that there is a strong argument to retain the allocated land in Weston Slopes within the Core Strategy and specifying land to be removed from the Green Belt in order to bring about certainty and a timely delivery of much needed housing land.

8.6 As detailed within the Arup Development Concept Options report, it is possible to discount areas of land which are heavily constrained by topographical, ecological or hydrological issues. In addition, Arup have taken into account the initial visual impact assessment, with allowances made within their approach. As a result two potential development scenarios are presented.

8.7 We detail below Option 2 which is the more conservative scenario. In both cases however our clients land is treated broadly the same, with the exception of a lower density in respect of Option 2.

8.8 Arup concluded that four parcels of land (A,B,C,D) have capacity in the order of 454 dwellings.

8.9 Area A (122 dwellings) has now been successfully registered as a Town and Village Green, thus cannot be included within any development proposals.

8.10 As a consequence the focus of development has shifted to the northwest, accommodating a revised figure of 332 dwellings, approximately 10% above the suggested allocation of 300 dwellings.

8.11 We have held discussions with the owners of parcels B and C and have been made aware that these are also available for development.

8.12 We therefore can conclude that our client's land is a vital source of deliverable future housing land within a location carefully reviewed by the Local Planning Authority and their consultants.

8.13 Through a logical and transparent process, the land can be held to be the most appropriate location for strategic development and noting the significant need for suitable housing land within the Local Authority area, should be designated as a strategic allocation as part of the Core Strategy and removed from the Green Belt. Recommendation

8.14 Confirm support for Policy B3A Land at Weston, Bath for release from the green belt and allocated for housing purposes.

Change to the policy requested:

**Respondent Number:** 4605 **Comment Number:** 1 **Respondent Name:** ian wilton

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

Housing development on Green Belt land is inconsistent with Section 9 of the National Planning Policy Framework (NPPF), which serves to protect Green Belt land.

The aim of Green Belt policy is to prevent urban sprawl; which would permanently damage the City of Bath.

**Change to the policy requested:**

Omit the sites adjoining Weston from the list of potential sites for housing development.

This gives better compliance with Section 9 of the National Planning Policy Framework (NPPF) and protects the city for residents and visitors, present and future.

**Respondent Number:** 4636 **Comment Number:** 1 **Respondent Name:** Ann Wilton

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**Support: 

Housing development on Green Belt land is inconsistent with Section 9 of the National Planning Policy Framework (NPPF), which serves to protect Green Belt land.

The aim of Green Belt policy is to prevent urban sprawl; which would permanently damage the City of Bath.

Building on green belt land is, definition, unsustainable.

**Change to the policy requested:**

This gives better compliance with Section 9 of the National Planning Policy Framework (NPPF) and protects the city for residents and visitors, present and future.

It would allow Bath to retain its World Heritage status.

**Respondent Number:** 4641 **Comment Number:** 1 **Respondent Name:** David Vernalls

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**Support: 

Whilst the reduction in development numbers from 300 to 150 is a small step in the right direction, there remain a number of significant problems within this proposal.

Moving on to specific issues. The first obvious problem with expanding Weston is school provision. The council documents blithely refer to contributions from developers to expand primary provision in the north west sector. Except that whatever funds are put up, there is no further expansion space at any of the existing sites, and no space is being provided within the development locations for additional schooling. The nearest school to these proposed sites (Weston All Saints Primary) is already expanding to become the biggest primary school in Bath (3 class intake) because of existing need in the area. Council meeting minutes make it clear that this expansion does not cater for any additional development in the area. (In fact despite not planning to take a 3rd class intake in September 2013, this additional class was added at the last minute due to numbers applying for primary places in the north of Bath – this clearly demonstrates current pressure). Whilst the school has additional land that could be used, any further expansion would make the school unmanageable in size. It is also the case that current plans for expansion are receiving considerable opposition from nearby residents due to traffic on the narrow road approaching the school. It is extremely unlikely therefore that this school could take any additional pressure from nearby development. Whilst distance priority would in reality allow pupils from the sites to be

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admitted, it would mean displacing children from other parts of the community, and with no capacity at either Newbridge Primary or St Mary's RC Primary, this will inevitably mean longer travel distances, impacting on the sustainability of adding more population to this area of Bath.

The second major problem is sustainability. Whilst the 3 sites are near current bus routes, 2011 census data shows that these areas already demonstrate relatively low bus patronage. This is a wider problem in Bath with a commercial operator enforcing high fares. Clearly whilst control of that is outside the planning process, planners need to be realistic and not assume that just because the bus passes the front door, families will choose to pay more to travel by bus than it would cost to drive and park. The sites either side of Lansdown Lane are both very distant and at considerable height compared to either the local facilities or the centre of Bath. Significant use of cycling or walking is unlikely. The shortest route from the supermarket in Weston to these sites is 0.8 miles, most of which would be uphill carrying shopping! Unfortunately as the parking in Weston is extremely pressurised due to the redevelopment of part of the car park, this is likely to mean people choosing to drive elsewhere to get their weekly shopping. Even the closer and lower site off Eastfield Avenue is half a mile from the nearest shops. Its worth noting that it is also a mile walking to the nearest doctors surgery from here, and 1.2 miles from the higher sites. Any consideration of these sites as being sustainable needs to properly consider the availability of adequate local services within reach of sustainable transport. Neither of these sites is suitable on that basis.

If either site is used then they will almost certainly add additional traffic. Eastfield Avenue is already problematic due to it being narrow with the housing having no off street parking. This leads to a single track effect - at present this works reasonably although there are occasional problems, however adding more traffic will increase delays – particularly to the buses which need more space. Deterioration in the bus service is likely to be counter productive. In addition the likely ultimate exit from this site as with the other two will be onto the steep Lansdown Lane. This has seen at least 8 accidents in the last 5 years, and regularly sees speeding incidents – at least partly due to it being steep downhill causing motorists to neglect to brake sufficiently to keep within the speed limits. The road is also used as a shortcut from north west Bath to access the M4 via Lansdown and the A420 so it has more than normal passing traffic as well as local traffic. Introducing additional traffic from Eastfield Avenue and two new additional access roads from either side for the new sites will pose significant dangers. This is something that planners at the time of applications would have to consider, which must impact deliverability on these sites.

**Change to the policy requested:**

With the capacity now greatly reduced, it must be sensible to consider removing the remaining proposals for Weston, and finding other locations for them. It is clearly not going to be easy, cost effective development to provide affordable housing. Arguably removing the 150 from the overall total will not actually impact the numbers built because it is clear that trying build a 20% increase in housing stock in short periods of time will depress prices and therefore freeze building. Removing this and possibly other greenbelt areas from the proposals will bring numbers down to closer to what is actually likely to be built and ensure that the brownfield development takes place first.

**Respondent Number:** 4659 **Comment Number:** 1 **Respondent Name:** Beverley Harris

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

Support:

Housing development on Green Belt land is inconsistent with Section 9 of the National Planning Policy Framework (NPPF), which serves to protect Green Belt land.

The aim of Green Belt policy is to prevent urban sprawl that would permanently damage the City of Bath.

**Change to the policy requested:**

Omit the 'sites adjoining Weston' from the list of potential sites for housing development.

This gives better compliance with Section 9 of the National Planning Policy Framework (NPPF) and protects the City of

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Bath for residents and visitors, present and future.

The investigations for developing 'brown field' sites for housing should be prioritised.

**Respondent Number:** 4667 **Comment Number:** 1 **Respondent Name:** Mr and Mrs Richard and Beverly Stark **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

Support:

This proposal is contrary to Section 9 of the National Policy Planning Framework. What is the point of having such a framework if it is then ignored?

Development should not take place on Green Belt land. The Government have claimed that they want to protect the Green Belt and have attacked the Labour party for plans which might threaten it. So this proposal runs contrary to Government policy and Government public statements issued this very week.

Green belts are there to curtail urban sprawl, to preserve the nature of historic towns and cities and to safeguard the countryside from encroachment. All of these are very relevant to Weston and Bath.

If Green belt land is not protected, what is to prevent future councils and governments from taking more green belt land once the precedent has been set? There will be pressure to build on adjoining land and to 'in fill' – whereas in fact these green spaces are hugely valued by the inhabitants of Weston and are of great value to the natural world – such as deer, foxes and bird life.

These Green Belt sites fall within the Bath World Heritage Site and the Cotswolds Area of Outstanding Natural Beauty (AONB), and are overlooked by the Grade I Listed Beckford's Tower. The Cotswold Way crosses this countryside – an important route for walkers and tourists whose first impression of Bath is the countryside around Weston. This proposed new development would have a strong visual impact on this area – and putting buildings on such a high and prominent site would make Weston feel far more built up and claustrophobic.

These are not suitable sites for development. They are a long way from public amenities and access is by a very steep and busy road, which has heavy commuter traffic. The junction at the top of Lansdown Lane is already an accident black spot (especially for cars trying to turn right) – and the last thing that should happen is to increase the traffic volume on this road. 150 new homes could bring up to 300 new cars using this road and the local road network.

This development will increase car-dependency. Only the extremely fit are capable of cycling up such steep gradients, so it is not suitable for most cyclists. Not everyone is capable of walking up such steep gradients either – especially carrying shopping. So the vast majority of the residents of this proposed new development will be using private cars. So more housing here will simply generate more car use and congestion around the centre of Weston.

Weston has already suffered from bad and unsympathetic development in the past. Weston does not have an adequate 'village centre' for its existing residents. The recent closure of Tesco in Weston for refurbishment and expansion (putting the car park out of use temporarily) has highlighted the acute shortage of parking places near local shops and businesses. Even when this car park reopens, it will have fewer spaces available because new housing has been developed on part of the car park site. There will be little parking available for existing residents – so how can Weston sustain more cars?

Weston is already struggling to cope with the amount of traffic it has to sustain. Weston is used as a cut-through to the motorway by commercial and domestic traffic. In addition, Weston is home to the large RUH hospital and has to cope with the traffic this generates – staff, visitors and outpatients who often drive to hospital and who often park on residential streets (so that shoppers cannot park on these roads either if they want to visit local stores). It is not

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appropriate to increase the volumes of traffic still further.

Local schools are already oversubscribed and have already been enlarged significantly where the school sites have allowed for this. Where will any new children go to school from this proposed development?

We do not believe that sufficient thought has been given to the existing infrastructure and amenities of Weston and the impact that increasing the population by, say, another 600 people and 200-300 cars would have on the area and its inhabitants.

We do not believe that the council have looked at enough brown field sites. It is clear that the trend towards internet shopping will have a major impact on cities in the next few years and will mean that more retail space is available for conversion to housing. This will have the benefit of keeping the city more compact and creating homes in central areas where it will be possible to cycle and walk to work and to the shops.

We do not believe that Bath needs as many new houses as have been required of the council to provide. There is already a great deal of development taking place in Bath – which will increase the population and the amount of traffic in the city as a whole. The impact of this has not yet been felt or assessed.

**Change to the policy requested:**

**Respondent Number:** 4681 **Comment Number:** 1 **Respondent Name:** Linda Stone

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

Support:

I reject the amendment on the following grounds:

1. Geological unsuitability of the site. The site behind Napier Road was earmarked for building upon 30 years ago. Access was left via Napier Road. However once the land was surveyed the underlying geological structure and the presence of springs upon the slopes rendered it unsuitable for building. The access was then closed. This unsuitability still stands. Heavy rains have revealed new springs emerging from our own patio which threatens our foundations. Houses in the road who try and level their plots find the presence of springs a problem. The land has been unstable in the past. Shortly after the houses were built some of them experienced slippage and had to be underpinned. We are concerned that if the land is disturbed through building this slippage would occur again and threaten the stability of our homes.

2. Congestion upon Lansdown Lane. Having lived in the area for the last 14 years we have noticed the steady increase of traffic upon this lane. It is heavily used as a cut through to the hospital and the west side of Bath. The junction at the top with Lansdown Road has become more congested over time with an increase of accidents. Recently an accident upon Lansdown Lane caused major congestion through the entire village, past the park and onto Julian Road, demonstrating clearly the amount of traffic now using the lane. This will increase with the new housing at the MOD site. Additional houses in Weston will only add to this congestion. The lane was not built to take this number of cars. Altitude shuts it during the winter when ice and snow make it difficult to use.

3. Amenities in the village. Being this far up the hill people will not walk to town or the village but take their cars. The village has very little parking as it is and cannot cope with additional traffic. Parking around Weston All saints school is already difficult and with an increase in pupil places and future building work this will only increase. Additional housing will add further burden. 150 extra home will in all likelihood add another 300 cars to this already congested area, with increased access problems onto Lansdown Lane.

4. National Planning Policy Framework Building on all 3 sites in Weston on protected hillside within an area of outstanding

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natural beauty, would have a detrimental impact upon the skyline , landscape and setting of our World Heritage city. The development of these site violates section 9 of the national planning policy framework.

**Change to the policy requested:**

Remove the consideration of the green belt sites around Weston from the core strategy.

Whilst I acknowledge that new housing is needed green belt land should be used as a last resort. All brown field sites need to be considered. Housing density needs to be looked at on Western Riverside and Sulis meadows. Our two universities need to take responsibility for their student accommodation on their existing sites, releasing more family housing in Oldfield Park. Housing currently not in use needs to be brought back into a sate fit for habitation.

**Respondent Number:** 4698 **Comment Number:** 1 **Respondent Name:** Robert Murton

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (Eastfield Avenue)

**Comment made on the Proposed Change:**

**Support:**

I would like to say that this area is already built up to its limits and taking areas out of the green belt is a bad idea (drawing attention to the NPPF section 9 points 80,81,83,85,87,88 and 92) when there are other areas in Bath that could be built on. This area has had enough housing and reaches far enough up the lower slopes, anymore would envelop houses below it. It has also come to my attention that even though it has not been allocated there is an area on the corner of Weston farm lane and the Weal which could be considered by the inspector if put up for development and linked to the proposed site behind Eastfield avenue. This area has been cleared under dubious circumstances and has been questioned by local residents and has been put up for replanting by the council and forestry people. However I have been informed that planning trumps replanting so that is why I am including it. Many local people put in objections to the applications made for this area and would know doubt feel the same about development.-these objections can be got from the planning dept I'm sure, as it seems they cannot be seen on your website anymore. This area and the one adjacent are used by many people for contact with nature and should not be used for filling up what green space is left on the lower slopes of Weston.

**Change to the policy requested:**

**Respondent Number:** 4767 **Comment Number:** 2 **Respondent Name:** Mark Funnell

**Respondent Organisation:** National Trust

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**

**Support:**

The National Trust understands that the detail for the five strategic sites is to be taken out of the Placemaking Plan and moved into the Core Strategy. In respect of development sites, the National Trust made the following comment in the Placemaking Plan consultation: "New development proposed for the development sites in and around the City of Bath should respect the historic character and appearance of the World Heritage Site and should not have an adverse effect on the green setting of the city". We therefore ask that the same comment is also taken into account in respect of the Core Strategy.

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**Change to the policy requested:**

**Respondent Number:** 4895 **Comment Number:** 1 **Respondent Name:** Mrs Margaret Wolfe  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I live at 73 Greenacres This has been my home for over 40 years.

My home is at the base of a very steep slope, I estimate that the land elevates by at least 100ft between my bungalow and the proposed site for development. The impact on my privacy will be immense and I am at a loss as to understand how this proposal could possibly be accepted. The land is also full of springs and I am also concerned that with the building of new homes the springs could flood my bungalow.

The plan, that was posted through my door by Councillor Lees, shows hedgerows and trees that will be retained. Unfortunately behind my property this is not happening.

I appreciate that new homes have to be built but I most strongly disagree with this proposed building in Weston Village, which is already at saturation point with traffic.

Unfortunately I was unable to attend Weston All Saints on Thursday 14 November due to a hospital appointment but have written to Councillor Lees who has informed me the Council arranged the Core Strategy Amendment meeting in Weston at very short notice.

**Change to the policy requested:**

I wish for this development to be cancelled.

**Respondent Number:** 4895 **Comment Number:** 1 **Respondent Name:** M S Wolfe  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

**Support:**

1. There are many natural underground springs on Lansdown and inevitably the water ends up in our gardens. When it has been raining hard the water will actually force its way through our garden walls!

2. As to the extra entrances on to Lansdown Lane this beggars belief!! Already this lane (which has not been updated in the last 40/50 years since we have been living here) is a main route to and from the M4. The 20 mph limit has not made it any easier to cross the road - for instance last Tuesday at about 4.30 p.m. before being able to cross the road we had to wait for 42 cars to pass- eventually one kind driver slowed down and beckoned us across!

As for the 20 mph limit - this has not had the slightest impact! Lansdown LANE is now like a main road but is still only a rural village route,

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3. Tesco is now building a bigger store in the village with flats above but has removed some of the original parking. If more houses plus cars are allowed it feels as if it will be the beginning of the end for the once lovely village.

This is an area of Outstanding Natural Beauty and as such the green belt area is very important especially in a Heritage City.

**Change to the policy requested:**

**Respondent Number:** 4923 **Comment Number:** 1 **Respondent Name:** Mrs Amanda Noyce **Respondent Organisation:** Withy King  
**Agent ID:** **Agent Name:**  
**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

Support:

1. Objection to construction in an Area of Outstanding Natural Beauty; destruction to wildlife habitats and interference with tranquillity of the area.  
 2. Limited access from Lansdown Lane, which is a narrow lane, very curved and very steep in gradient. The area and the lane cannot cope with increased traffic flows. The junction with Lansdown Road at the top is one of the most dangerous in Bath as it is.  
 3. There is a significant problem with water flows off the field and flowing down Napier Road to the foot of the valley in wet weather. The geology of the area is not stable.

**Change to the policy requested:**

No development of the land to the west of Lansdown Lane at all.

**Respondent Number:** 4925 **Comment Number:** 1 **Respondent Name:** Cllr Colin Barrett **Respondent Organisation:**  
**Agent ID:** **Agent Name:**  
**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

Support:

Overdevelopment  
 Prior to Weston Village joining the City of Bath in the early Fifties there were 676 residential properties in the Village. Since then the number has increased to 2825 an increase of 420%  
 Although the proposed additional 150 properties as part of the core strategy, only 1% of the total for all of BANES. However, it represents a 7% for Weston which since the early Fifties is 440%  
 Flooding  
 Weston Village has always been prone to flooding due to the springs and sinks. Weston Brook has been placed in a culvert and runs through the High Street.  
 Since I came to live in Weston in the early Sixties there has been more than seven floods, of these three have been since 2002 the latest in 2012.  
 Because of the problem of flooding 770 gullies have been installed to try and alleviate the problem. The result of a recent survey carried out in Weston into the problem of flooding established that there is a possibility that 310 properties could be in danger even before the additional properties are built.

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Green Belt, AOB and Cotswold Way

The land to the north of the Village is classified as Green Belt an Area of Outstanding Beauty and part of the Cotswold Way which passes through the village.

These areas contain a very large number of sinks and springs and during Georgian times this was where all the washing was laundered for the gentry of the city.

It interesting to note that in order to maintain the beauty of the area the owners of the Lansdown Racecourse have only recently had all the electricity cables running alongside the road by the racecourse placed underground as they were spoiling the view.

It is therefore, very important that Green Belt and Areas of Outstanding Beauty should be protected as stated in Government policy.

Traffic.

The volume of traffic that passes through Weston Village is very heavy.

In May 2013 a traffic count was carried out and in one week over seventy thousand vehicles used Lansdown Lane which equates to three and a half million vehicles a year.

Lansdown Lane is very steep, narrow and twisting, and is used as the main route to the M4 and Abbey Wood. It has a width restriction of six feet six inches and a weight restriction of seven and a half tons.

The only improvement to the roads in Weston Village since the late Sixties is from the roundabout at the bottom of Lansdown Lane to Napier Road, Anchor Road and Crown Road. From the roundabout at the bottom of Lansdown Lane to Napier Road, a distance of some 800yards at present ten roads lead into Lansdown Lane this would increase to twelve if the proposed development is granted .

Schools

There are at present two Local Authority Primary Schools in Weston and one has just this year become a three year entry thus increasing the number of pupils from 420 to 630. This does not take into account the proposed new development. Also in the village we have one private school with an additional one opening in January 2014 and there are also three nursery schools.

Prior to the middle Fifties there was only one school in Weston Village catering for infant, junior and senior pupils.

Conclusion.

1 Weston Village simply cannot cope with the proposed additional properties with the present infrastructure.

2 There are very serious concerns about the flooding of Weston Village.

3 The Green Belt together with the Area of Outstanding Natural Beauty should be fully safeguarded from this additional development as stated within the NPPF.

4 The additional roads leading onto Lansdown Lane will further increase the hazardous conditions which already exist for pedestrians and all road users.

**Change to the policy requested:**

**Respondent Number:** 4929 **Comment Number:** 1 **Respondent Name:** Valerie Blanchard

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I have lived in Napier Road since 1970 & on numerous occasions have been reassured by the owner of Heather Farm that the land adjacent to Napier Road would never be built on. So, am very sorry to the news that this may or will change. I appreciate the need for more housing, but my main concern would be the increase of traffic onto Lansdown Lane.

Also, since the M4 opened, Lansdown Lane has become a 'ratrun' for access to the motorway, & an increase of traffic can only add to the problem.

Sadly to, there is the loss of my countryside & beautiful landscape views we have, not to mention the wild life.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

Abandon all proposals that remove land from Green Belt and AONB.

**Respondent Number:** 4933 **Comment Number:** 1 **Respondent Name:** Royston Crew**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

I strongly object to the proposed housing development and removal of green belt land, behind Napier Road and Greenacres Upper Weston.

Many residents including myself have problems with the springs.

I also have great concerns over the increasing traffic on Lansdown Lane. It has become extremely busy over the last few years, to avoid the City Centre, and despite there being a speed limit it doesn't seem to deter the speeding.

Mornings are very congested with the School crossing and buses, surely this lane is not adequate for vehicles from another 150 dwellings!

**Change to the policy requested:****Respondent Number:** 4948 **Comment Number:** 1 **Respondent Name:** Mr Terence Holvey**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

I wish to raise my concerns regarding proposal to allocate sites for housing in the above areas.

My concerns for the unsuitability of such a proposal are as follows. Based on experience of having lived on Greenacres for over 50 years.

1.This is an area which has been previously surveyed by numerous groups of Bath City planners over many years and the ground was always found to be unstable due to the natural springs and subject to flooding. Over the years attempts to alter the terrain has caused whole areas of the slope to shift creating corrugations on the land surface and the movement of whole hedgerows endangering the road itself.

2.The increase of traffic in the area, particularly in Weston Village and Lansdown Lane as a main artery to access the A46 and M4, Gloucester, London and Bristol. My local Councillor Mr. Colin Barrett confirms that at present the number of cars (lorries and vans) using this small country lane is 312 million a year. No attempts have been made to improve this lane to cope and improve it not surprisingly this is probably because it is green belt and an area of outstanding natural beauty. (AONB) Two additional exits on to this narrow lane with steep gradients would add further danger so close to Weston All Saints School. Large vehicles already ignore the 6ft.width restriction and the new 20 m.p.h. signs.

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3.The current parking areas in the village are totally inadequate and with TESCO's intention to enlarge their present store by building on their car parking area, and local street parking occupied by Royal United Hospital staff another 150 houses would create further problems for the local community shopping in the village.

I have tried to be constructive in my comments and hope that they will be considered in that light. Despite Government policy for additional affordable housing for all areas in the U.K. I feel that Bath, and Weston in particular, has already exceeded the acceptable expansion and is in danger of losing its World Heritage Site and Area of Outstanding Natural Beauty title.

Governments come and go, but the citizens of Bath are here to stay. We have the power so lets have a say in what happens to our beautiful City.

**Change to the policy requested:**

**Respondent Number:** 4955 **Comment Number:** 1 **Respondent Name:** Grahame Luker  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The proposed development (especially to the rear of Napier Road is totally unsuitable as the main road (Lansdown Lane) is merely a dangerous twisty lane with fast / speeding traffic & would completely spoil the landscape & views locally & from afar. Problems already would manifest in bad weather: ie freezing on this steep lane. I had planning permission rejected on these grounds for a single dwelling at the rear of my garden some 5/6 years ago.

**Change to the policy requested:**

**Respondent Number:** 4963 **Comment Number:** 1 **Respondent Name:** Mr Brian Clark  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Historically there are springs in the area of the proposed development so therefore the enhanced risk of flooding to existing properties in the area should not be taken.

The access to the proposed area is off a very steep and narrow twisty road (Lansdown Lane). Already there have been several fatal accidents in the lane in the last few years. Access at the top is also tricky with the volume of traffic turning right into the lane making it dangerous for the Weston traffic to come out from the village.

**Change to the policy requested:**

Withdraw the development proposal.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 4973 **Comment** 1 **Respondent** Mr Graham Pristo  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

Bath is a very unique and wonderful city. It is different because of the green hills that can be seen from virtually anywhere in the City. The Green Belt 's sacrosanct to Bath.

The proposed change to Weston will spoil many things and is ill thought out. There are many springs coming off the hill that will be diverted into existing homes, causing untold trouble.

Do not build on Weston slopes!

**Change to the policy requested:**

Withdraw the development proposal.

**Respondent** 4974 **Comment** 1 **Respondent** Katharine Pristo  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

I believe this strategy is completely unnecessary. There is plenty of suitable brown belt to be built on & plenty of empty buildings in central Bath that should be renovated for social housing. Our property will surely be affected by this development e.g. streams (water takes no prisoners) . Noise, possible crime increase, increased taxes, traffic congestion, wildlife i.e. deer, jays, bats, herons, white light.

Retthink... lets not do this please.

**Change to the policy requested:**

Just don't do it.

**Respondent** 4983 **Comment** 1 **Respondent** James and Mary McKillop  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

The fundamental aim of the green belt policy is to prevent urban sprawl and this has been reiterated in the NPPF of March 2012, i.e.

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- a.To check the unrestricted sprawl of built up areas
- b.The safeguarding of the countryside from encroachment
- c.Retention of agricultural land.

Core Strategy National policy further states that the general extent and detailed boundaries of green belt should be altered only in exceptional circumstances .

In light of the above, it is a disgrace to be contemplating infringing the green belt when we know that the number of houses proposed for this area is considerably more than required. To deplete the green belt so that developers can make a killing by blackmailing the council regarding the provision of affordable housing is blatantly wrong.

With regard to the proposed Weston developments on either side of Lansdown Lane, surely the council is aware that this road is already very heavily used and congested particularly at peak times and at school arrival and departure times. Additional houses with the increase in population will aggravate these problems, particularly as there are no prospects of enhancing Lansdown Lane to cope.

There is already a land drainage issue on some of the properties on Napier Road which is adjoining one of the proposed development sites. How is it proposed to prevent this being aggravated?

**Change to the policy requested:**

**Respondent Number:** 5001 **Comment Number:** 1 **Respondent Name:** Robert Cairns

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I am concerned that the areas involved – both on steeply sloping land above the village are unsuitable.

The area has a substantial ‘run off’ following heavy downpours, much is soaked into the ground too. With the solid surfaces (hard-standing and paved drives, roads, pavements etc.) resulting with this development run off will be even worse resulting in water running into properties in Greenacres and Napier Road.

Increased drainage would not help and the water from this joining the main drains through Weston High Street would overload the existing overtaxed system.

Traffic is already very heavy on Lansdown Lane, increased traffic resulting from the new homes would seriously overload the already stretched Lansdown Lane which is used as access to the Royal United Hospital for emergency services delaying their journey accordingly.

**Change to the policy requested:**

Removal of this area from plans for housing development.

**Respondent Number:** 5003 **Comment Number:** 1 **Respondent Name:** Mr & Mrs Smart

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

Concerning planning for 100 houses in field behind Napier Road. After heavy rain the gardens get flooded, so many natural springs in the area. Extra traffic using Lansdown Lane, which is already used by many motorists to M.4 motorway.

**Change to the policy requested:**

Removal of this area from plans for housing development.

**Respondent Number:** 5011 **Comment Number:** 1 **Respondent Name:** G M Gadding

**Respondent Organisation:**
**Agent ID:** **Agent Name:**
**Further Information available in the original comment?**  **Attachments sent with the comment?** 
**Change Reference:** CSA25 Land adjoining Weston (General)**Location:** Land adjoining Weston (General)**Comment made on the Proposed Change:**Support: 

1. There are many natural underground springs on Lansdown and inevitably the water ends up in our gardens. When it has been raining hard the water will actually force its way through our garden walls!

2. As to the extra entrances on to Lansdown Lane this beggars belief!! Already this lane (which has not been updated in the last 40/50 years since we have been living here) is a main route to and from the M4. The 20 mph limit has not made it any easier to cross the road - for instance last Tuesday at about 4.30 p.m. before being able to cross the road we had to wait for 42 cars to pass- eventually one kind driver slowed down and beckoned us across!

As for the 20 mph limit - this has not had the slightest impact! Lansdown LANE is now like a main road but is still only a rural village route,

3. Tesco is now building a bigger store in the village with flats above but has removed some of the original parking. If more houses plus cars are allowed it feels as if it will be the beginning of the end for the once lovely village.

This is an area of Outstanding Natural Beauty and as such the green belt area is very important especially in a Heritage City.

**Change to the policy requested:**
**Respondent Number:** 5012 **Comment Number:** 1 **Respondent Name:** Mrs Sheila Read

**Respondent Organisation:**
**Agent ID:** **Agent Name:**
**Further Information available in the original comment?**  **Attachments sent with the comment?** 
**Change Reference:** CSA25 Land adjoining Weston (General)**Location:** Land adjoining Weston (General)**Comment made on the Proposed Change:**Support: 

1. There are many natural underground springs on Lansdown and inevitably the water ends up in our gardens. When it has been raining hard the water will actually force its way through our garden walls!

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2. As to the extra entrances on to Lansdown Lane this beggars belief!! Already this lane (which has not been updated in the last 40/50 years since we have been living here) is a main route to and from the M4. The 20 mph limit has not made it any easier to cross the road - for instance last Tuesday at about 4.30 p.m. before being able to cross the road we had to wait for 42 cars to pass- eventually one kind driver slowed down and beckoned us across!

As for the 20 mph limit - this has not had the slightest impact! Lansdown LANE is now like a main road but is still only a rural village route,

3. Tesco is now building a bigger store in the village with flats above but has removed some of the original parking. If more houses plus cars are allowed it feels as if it will be the beginning of the end for the once lovely village.

This is an area of Outstanding Natural Beauty and as such the green belt area is very important especially in a Heritage City.

**Change to the policy requested:**

**Respondent Number:** 5013 **Comment Number:** 1 **Respondent Name:** Sean & E A Clark

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

**Support:**

1. There are many natural underground springs on Lansdown and inevitably the water ends up in our gardens. When it has been raining hard the water will actually force its way through our garden walls!

2. As to the extra entrances on to Lansdown Lane this beggars belief!! Already this lane (which has not been updated in the last 40/50 years since we have been living here) is a main route to and from the M4. The 20 mph limit has not made it any easier to cross the road - for instance last Tuesday at about 4.30 p.m. before being able to cross the road we had to wait for 42 cars to pass- eventually one kind driver slowed down and beckoned us across!

As for the 20 mph limit - this has not had the slightest impact! Lansdown LANE is now like a main road but is still only a rural village route,

3. Tesco is now building a bigger store in the village with flats above but has removed some of the original parking. If more houses plus cars are allowed it feels as if it will be the beginning of the end for the once lovely village.

This is an area of Outstanding Natural Beauty and as such the green belt area is very important especially in a Heritage City.

**Change to the policy requested:**

**Respondent Number:** 5017 **Comment Number:** 1 **Respondent Name:** G T Perkins

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

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(1) &amp; (2) Points taken – correct

(3) Living in the area of concern for the affect. I have seen land slides, flooding and constant erosion – still notable – clear to see.

(4) Two more roads with access to the lane – has anyone counted? 7 (seven) on the left 6 (six) on the right. No! the lane cannot cope. Weight and width sign – school sign – road marking all are constantly ignored!!! Could be the weight sign is in the wrong place! – still much and heavy traffic tries the lane, some fail and reverse at the farm road!!

(5) Local Amenities – what! – where? If all the shopping area was used it could still struggle so with extra housing I think impossible!

(6) Surely Government policy would not approve of the spoiling of the beauty of the Heritage site and there must be other areas for housing use.

Please do not spoil the city, the parks, the wild walks.

**Change to the policy requested:**

<b>Respondent Number:</b> 5018	<b>Comment Number:</b> 1	<b>Respondent Name:</b> A K Blake,A Blake,S Skelton,S Cammarata & J A Firth	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		

**Further Information available in the original comment?** 
**Attachments sent with the comment?** 
**Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

As residents of Greenacres we wish to express our views on the proposed housing development within this area. Our particular points for concern are as follows:

- 1.Ground Stability with regard to the number of streams / springs in the area
  - a.Variable climatic changes can affect the water table producing risk of flooding and movement.
  - B.Excess drainage could affect existing properties.
  - C.Our properties border on the proposed development and there has already been experience of the above.
- 2.We are within an area of Outstanding Natural Beauty
- 3.The proposed sites are within Bath City’s World Heritage Site
- 4.Lansdown Lane
  - a.This is a minor road with both weight and width limits.
  - B.It is already heavily used by traffic for access to the A420 / M4.
  - c.Two further access points from the proposed developments will increase the volume of traffic causing congestion at a point of the road which could lead to accidents especially if a further reduction in the already ignored speed limit is introduced.
- 5.General infrastructure

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a.Weston village has limited amenities and parking is at a premium

b.The village and surrounding roads are frequently used as an overflow for the Royal United Hospital’s poor car parking facilities.

C.Will the Royal United Hospital, local doctors’ surgeries and schools have the resources to cope with an increase in the population of Weston?

In conclusion surely already empty buildings, within Bath, together with existing brown sites not in the green belt should be further developed.

**Change to the policy requested:**

**Respondent Number:** 5023 **Comment Number:** 3 **Respondent Name:** Helen Acosta

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Green Belt land should not be developed. Alternative brownfield sites should be considered, to avoid loss of Green Belt.

As part of the Cotswolds, this is an area of outstanding natural beauty and irreplaceable once lost.

Developing Green Belt land is inconsistent with Section 9 of the National Planning Policy Framework (NPPF).

To develop on the Green Belt is to allow urban sprawl to encroach on the surrounding countryside, which Green Belt status is supposed to prevent.

Development of this are would promote car-dependency and traffic increase.

**Change to the policy requested:**

Abandon the plan to develop this Green Belt land and explore alternative brownfield sites for development.

**Respondent Number:** 5029 **Comment Number:** 2 **Respondent Name:** Alison Wilding

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I object to the 3 proposed core strategy development sites in Weston, Bath, for the following reasons:

- The proposed sites are in an area of outstanding natural beauty and adjacent to the Cotswold Way
- They all fall within the world heritage site of the City of Bath
- I have grave concerns regarding the increased likelihood of flooding should the development take place. I understand my property was flooded in the 1960s, and I believe that more building work in an area which contains so many springs and is so prone to flooding may cause this to happen again. Furthermore, should this occur, neither the council nor the developers would accept any liability.....
- Lansdown Lane, the proposed access point for 2 of the sites is a very steep, winding and rather narrow hill. Despite this, it is one of the main routes into Bath and is already used by over 3 million cars annually. Its location and gradient make it unsuitable for building site traffic. It is already subject to a 20mph speed limit and traffic would be required to slow down

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

even further to allow access to side roads. This is an accident – or a series of accidents – waiting to happen

- Weston village already has a severe shortage of parking, and 150 new homes would exacerbate the problem significantly
- Employment prospects in Bath itself are very limited – apart from retail and tourism - because it is such an expensive place to live and work. There are increased employment prospects in the surrounding areas.

**Change to the policy requested:**

**Respondent Number:** 5034 **Comment Number:** 1 **Respondent Name:** Barry Smith

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The Geology of the area renders building not feasible

Planning permission has previously been refused – so what has changed

Extra housing will overload local services and infrastructure.

**Change to the policy requested:**

**Respondent Number:** 5044 **Comment Number:** 1 **Respondent Name:** Mr Steven Thorne

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I have concerns that the houses opposite us with water courses running through are liable to flood under the pressure of so many new houses in the area. Also I have been informed that existing properties have some issues with ground stability and as we are so close to the proposed area our house may be affected.

The volume of traffic in through this small lane is already great and I feel that the number of new houses using this access point will add additional strain to the infrastructure.

As a parent I am concerned about the additional strain on local schools and nurseries and also even on simple things like getting enough room on the buses to get a pram on board which is already difficult at times.

I also have general concerns about the development of green belt land especially when there is empty property in Bath such as the old council building.

**Change to the policy requested:**

Total review of the proposal to develop the green belt land around Weston village.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 5047 **Comment** 1 **Respondent** Claire Doig  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:** Land adjoining Weston (General)**Comment made on the Proposed Change:**Support: 

I do not consider the amendment to the Core Strategy to be sound for the following reasons:

It is not justified to move the Green Belt boundary for housing. This amendment in the Core Strategy is not consistent with section 9 of the National Planning Framework.

It is not positively prepared as the local infrastructure is already under stress due to the large volume of traffic, particularly around Weston all Saints Primary School along Broadmoor Lane. Increasing housing and traffic in land adjoining Weston area will make the situation even worse and far more dangerous for children travelling to school on foot. There have already been many complaints and objections to the council about traffic safety and school expansion in this area. Any development of new housing in this area would not be sustainable development.

It cannot be more appropriate to build on Green Belt before all Brown field and other more suitable and non- green belt sites are considered for development. Even sites previously refused permission for development could be re-considered and all existing housing stock is occupied or refurbished if necessary.

Also, the proposed number of houses has been reduced significantly so please could further re-calculation be done and more suitable, sustainable sites be found?

**Change to the policy requested:**

Please remove "Land adjoining Weston" from plans for housing development in the Core Strategy .

**Respondent** 5057 **Comment** 1 **Respondent** Suzanne Bateman  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

I understand that the proposal to remove land from the Green Belt is inconsistent with the NPPF section 9 which serves to protect the Green Belt. This site is protected hillside for a very good reason, an area of outstanding natural beauty, and as such sustains all aspects of plant life, wildlife, birdlife, recreational activities etc. it is a most beautiful setting and to consider destroying it really is a short sighted idea and one which has no true vision in it except to bow to government policies and meet targets. Our Green Belts must be protected from officials, and developers who only see a quick fix. The city of Bath is a special place to live and recognised the world over for its beauty and heritage. To even consider the destruction of such beautiful scenic Green Belt which contributes so much to Bath's acclaimed World Heritage status is nothing short of criminal. Other countries throughout the world strive to protect that which is acclaimed, I can only hope that those of you involved in the decision making process realise how truly destructive this would be. Green Belt is protected for a reason, it is a necessary and vital resource, one which gives so much to mankind in all its many facets and I urge you please to find an ulterior location which does not involve the further destruction of Green Belt. To this end I would ask you to undertake a full and comprehensive assessment of ulterior sites, in other more suitable areas, which will not culminate in the loss of a landscape, skyline and setting so incredibly special to the city of Bath.

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Points as above, [ section 7] to search for an ulterior location which does not destroy Green Belt sites.

**Respondent Number:** 5058 **Comment Number:** 1 **Respondent Name:** Steven Brunton**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

I do not believe this strategy change is sound as I believe that expansion of the green belt is unnecessary. Bath is already a hard pressed city and the local strategy should reject further expansion of the city boundary unless there is a very significant investment in city services and underground and above ground infrastructure.

I also believe that proposed site is unsuitable for further development. Houses on the North side of Napier Road have an intricate web of underground streams and drains to deal with excess water in the clay soil. These drains contain water even in the driest of summers. I am therefore very concerned about the proposed development making the situation worse and the impact on the foundations of my house and properties near my house.

We have Bats. I do not know where there come from but 2 bats have appeared in our garden every summer night for the 17 years we have lived here.

I am very concerned about land stability. I understand this hillside suffered a small landslip some 20 years ago, albeit on the other side of Lansdown Lane. What does the "geological instability" on the map mean? Why would you build on land known to be geologically unstable?

Water pressure is low in this area and the sewers have become blocked and backed up the estate twice in the last few years. My neighbours are at a sewage low point on our side of the road and have had sewage leaking onto their drive as a result. I suggest the drainage infrastructure for the whole area would need to be investigated and potentially upgraded.

In short I disagree the change as I believe that the proposed area is unsuitable for further development.

**Change to the policy requested:**

I am requesting that this change is rejected. There are better 'brown field sites in Bath that would be more suitable for re-use.

I disagree the limitations would retain the intent of being a World Heritage Site. These changes will be visible from distance and many vantage points around Bath.

Local Schools are already beyond capacity and the roads very busy as a main 'rat run' out to the Motorway and Bristol.

Broadband speeds are limited as we are at the end of the line. The telecomms infrastructure in the area will need upgrading to avoid further degradation in the area.

I support energy efficiency but question how solar panels this high up are compatible with this area being a WHS.

**Respondent Number:** 5059 **Comment Number:** 1 **Respondent Name:** Mr Stephen Reynolds**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

Greatly concerned about the effect 150 new buildings will have on lad slippage to properties on Napier Road and below. Also to drainage. There are already problems with water not soaking away but running across the land. Also security to rear of our property during the building period and afterwards if there is a road behind our garden.

Wildlife routes and habitat will be disturbed – badgers and owls use this land.

**Change to the policy requested:**

Re think the choice of this land as suitable for new houses.

**Respondent Number:** 5060 **Comment Number:** 1 **Respondent Name:** Mrs Sophie Dyer**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

I don't think Weston Village can support the increase in population and traffic.

**Change to the policy requested:****Respondent Number:** 5061 **Comment Number:** 1 **Respondent Name:** Sean Stevens**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

This area has little infrastructure. It barely copes with the traffic conditions as it is without extra traffic any more building would attract.

Please do not build here.

**Change to the policy requested:****Respondent Number:** 5069 **Comment Number:** 1 **Respondent Name:** Mrs Rosalind Smallwood**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

Removing any land from the Green Belt is inconsistent with the National Planning Policy Framework, Section 9, which is supposed to protect the Green Belt.

Road access from Napier Road and Eastfield Avenue to Lansdown Lane is already very difficult at peak traffic times. Conditions for pedestrians and cyclists are already poor. They would be even worse for more residents further up the hill, in fact, unsustainable.

NB. We have long felt the need for a proper footpath up to the top end of Lansdown Lane. Walking up this hill is really dangerous.

**Change to the policy requested:****Respondent Number:** 5075 **Comment Number:** 1 **Respondent Name:** Mr Peter Clements**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

You propose to allow housing development up hill from Napier Road and Eastfield Avenue

This should not be allowed to happen as

- (a) It is the Green Belt and to remove it is inconsistent with the National Planning Policy Framework (NPPF) Section 9 which serves to protect the Green Belt.
- (b) The development is directly opposite the Cotswold Way National Trail which is a very necessary element in the promotion of TOURISM to Bath. It is Internationally known and derives its popularity and status from the manner in which it presents the Cotswolds to the World. To allow further housing to climb the hillside will detract from this most excellent amenity.
- (c) All services, particularly drainage from the above Napier Road site, will have to be taken through Weston High Street via Lansdown Lane. The installation of such drainage from both sites will cause massive disruption to Weston village.
- (d) The further introduction of "hard" surfaces, i.e. roads, roofs and driveways/parking areas, on a hill above Weston will threaten Weston High Street and Manor Road with flooding. This has been experienced historically and, although work has been carried out to alleviate the current situation, to add further hard surfaces above Weston is a sure recipe for serious flooding. Weather in the United Kingdom has shown a marked tendency to more extremes of rain and this, if allowed to combine with your proposal, will surely guarantee floods in Weston. It is unlikely that you will be able to accommodate sufficient storm water drainage to cope.
- (e) The arrangements for traffic entry to the local Primary School are hopelessly inadequate and dangerous. This is at present. It is only a matter of time before a serious accident happens in the area of All Saints School gates. Is it your intention to make it more certain? By allowing this development you surely will be part of the accident which must happen if more children are educated at this school. The dangers around this school entry have already been the subject of warnings.
- (f) The Lansdown Lane, Lansdown Road, Freezing Hill route, an already busy route to and from the M4 is unsuitable for more traffic. (See what happens at the Tog Hill junction during busy periods- it is not uncommon to find traffic queued for half a mile or more to enter the A420) To allow this development would certainly create more traffic as there is little employment in the Bath Area.
- (g) The Government and B&NES council are trying to encourage travel by bicycle. It is doubtful if many will want to cycle to and from land above Napier Road from Bath. Such a development would be completely unable to sustain cycle travel.

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The same can be said for encouraging pedestrian access – it will not work.

(h) The plans also have ecological consequences for European Protected Species - Bats

**Change to the policy requested:**

**Respondent Number:** 5078 **Comment Number:** 1 **Respondent Name:** Paul Courtney

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I do not consider that the proposed Core Strategy Change appropriate.

The Land Adjoining Weston should remain Green Belt, and it should not be subject to development.

**Change to the policy requested:**

The Land Adjoining Weston should be omitted from all future development proposals and remain Green Belt.

**Respondent Number:** 5087 **Comment Number:** 1 **Respondent Name:** François Chaté

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I object to the proposal to allocate land for residential development in the Greenbelt in Weston. My objection stems from the following views:

1.It occurs to me that the Council has not properly thought through their land allocation strategy following the request by the inspector to identify additional residential land. As a result, in my view, the Council has taken a reactive approach in pushing through any small bit of land that could be promoted, without any proactive and overarching strategy.

2.This reactive approach leads to proposals that can simply be described as ‘eating away’ at the Greenbelt without overall vision. In short, this is urban sprawl, the very thing that the Greenbelt is meant to guard against.

3.There are a number of significant issues with developing the sites identified for residential use, including:

4.Ecology,

5.Geology and ground stability

6.Accessibility and transport

7.Road safety

8.Infrastructure (school in particular)

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9. Addressing these issues on the sites identified would cost a significant amount of money and the viability of the developments is therefore questioned. In the context of a Council trying to justify a suitable land supply, allocating sites with very little chance of being viable does not make sense.

10. To go back to some of the issues, in terms of transport and accessibility, although it is recognised that Weston benefits from a small high street with a number of local shops, it is my view that the land identified for allocation is remote from the centre of the city. Public Transport access is relatively poor and therefore the car is for most people living in the area the main means of accessing the city centre. This goes against transport sustainability principles and to be addressed would require significant investment in public transport services that a 150 residential unit development would be unlikely to afford.

11. On infrastructure, the local schools are already busy and WASPS for example is in the process of expending simply to meet existing demand. The proposed allocation would simply compound the issue, without any real ability to address it.

12. In conclusion, the proposed allocation is akin to urban sprawl, lacks vision, is likely to lead to allocating developments that would not be viable or deliverable, weakening the Council's land supply, and that would not be able to afford to fully mitigate their impact on the local community.

13. In that context, my view is that this proposed allocation is against the NPPF principles as it is not positively prepared, justified, effective or consistent with national policy.

**Change to the policy requested:**

I would like reference to land allocation in Weston to be removed.

**Respondent Number:** 5094 **Comment Number:** 1 **Respondent Name:** Humphrey Pain

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

Support:

Housing development on Green Belt land is inconsistent with Section 9 of the National Planning Policy Framework (NPPF), which serves to protect Green Belt land. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness and permanence. The identified sites in Weston satisfy important roles of Green Belt land, as set out in the NPPF, including: (i) checking urban sprawl, (ii) safeguarding countryside from encroachment, (iii) preserving the setting and special character of historic towns.

There are also problems with the proposal based on grounds of sustainability: building homes in the outer reaches of Upper Weston would promote car-dependency (the sites are remote from amenities, and offer poor pedestrian and cycling routes along Lansdown Lane, with its steep gradient and lack of protection from heavy commuter traffic). Housing development on these identified sites would build on protected hillside within an Area of Outstanding Natural Beauty, and would have a strong visual impact on the skyline and landscape of this World Heritage city.

**Change to the policy requested:**

I acknowledge the need for new housing both nationally and locally, but are concerned that Green Belt land should only be developed as a last resort. I am particularly concerned by the lack of robust assessment of alternative sites, considering that planning has been turned down on less obtrusive, non Green Belt sites in other areas in B&NES. I know that estimates by planners for housing in the Weston Green Belt have consistently been shifted downwards, from an original 1000 homes to 300 homes to now a possible 150 homes: I would urge planners to rethink their numbers further, so that no irreplaceable Green Belt land would have to be lost to development as part of the Core Strategy.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5100 **Comment Number:** 1 **Respondent Name:** Mr Jim Ferron**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

The impact of this development will be detrimental to the natural beauty of the area.

Plus, it will generate an increase in traffic in the Weston area throughout construction.

Long-term, the increased volume of traffic will be a negative - Weston High Street is already congested with a bottle-neck at the roundabout at the foot of Lansdown Lane, where traffic is forced to a single lane coming into and exiting the village by the existing residential parking areas. There are already difficult and hazardous traffic conditions created by the parking bay outside the shopping precinct on the high street. Any additional traffic using the Eastfield Ave junction at Lansdown Lane and Weston High Street from the proposed new development will only add to the congestion at both these points. Lansdown lane is already a 20mph zone at the location of WASP school and the provision of a Lollipop patrol at the roundabout will be put under additional stress.

**Change to the policy requested:**

Refusal to the development as proposed in the application CSA25.

**Respondent Number:** 5114 **Comment Number:** 1 **Respondent Name:** K A Jane White**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

The development of this site violates section 9 of the National Planning Policy Framework.

**Change to the policy requested:**

I would like the policy to be dropped in its current form. I support the creation of affordable housing in Bath but the current strategy does not even have the majority of new build in Land adjoining Weston within this category. Given that this area is Green Belt, and home to bat populations which are protected, it should surely only be exploited when ALL other options have been used up. Moreover, the increase in housing requirements seems to be linked to the creation of 10,300 new jobs in Bath but I have no idea where these jobs will be created and indeed their nature (and hence the people that will be attracted to them and their corresponding housing requirements).

It seems that the council have made a poor decision to work with a developer that is exploiting the need for affordable housing. It would be refreshing if the council acknowledged this and worked to create a sensible strategy which deals solely with the actual housing needs of the city and does not destroy green belt for inexcusable reasons.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5121 **Comment Number:** 2 **Respondent Name:** Mr & Mrs A R Emery**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

**Flooding**  
According to the Environment Agency's maps, to the West of Lansdown Lane is Flood Zone 1. The water is running down from the springs in the fields above our property, down through Napier Road and Leighton Road, even in dry weather. Our back garden has sand bags adjacent to our property all year long to prevent the spring water's seeping into the house. By building on the field above Napier Road surely this would have a significant impact on the flow of the springs, causing, not only problems to the possible new housing development but more problems to the current owners within the area.

**Transport and Access**  
Lansdown Lane is one of the main routes into Bath and over the last few years the traffic has overwhelmingly increased. It is also one of the main roads to the motorway. As the word "Lane" suggests it's not a major road. Another access onto a new site would cause serious problems onto the "Lane" with the extra volume of traffic, which we encounter at work times at present. No paths for pedestrians after Napier Road.

**Landscape**  
The land to the west of Lansdown Lane forms part of the World Heritage Site and the development would have an unfavourable landscape impact on the views. This is also classed as an area of Cotswold area of outstanding natural beauty.

**Comments**  
1. The Council have always stated while there was brown belt land available to build, the green belt would be left as an area of natural beauty. As we understand there is plenty of brown belt land available which they could use with no outstanding problems.  
2. The impact on the village of Weston, with limited parking areas and shops and the overcrowding of our local schools.  
3. The money that we have spent on buying our property 5 years ago with the added improvements will reflect on the property price, and if we choose to sell we will be penalised especially if there is going to be social housing.

**Change to the policy requested:****Respondent Number:** 5125 **Comment Number:** 1 **Respondent Name:** Michael Jones**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

1) The proposed housing development on Weston Slopes completely violates Section 9 of the National Planning Policy Framework and as such makes a mockery of this framework by disregarding agreed Planning Policies designed explicitly to keep certain areas free of development for any purpose.

2) Secondly there is no benefit whatsoever in these proposals for any of the existing residents of Weston who already

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

endure endless traffic jams from commuters and others who daily use Lansdown Lane then driving through Weston High Street and creating extremely heavy traffic at peak times , if the development went ahead for the 150 houses that would create a minimum of at least 300 extra traffic movements a day which would be impossible to accommodate given the current traffic activity. The roadway in Lansdown Lane above Napier Road is also extremely narrow and does not have any pavements at all on either side of the road and given the extra footfall and additional volume of traffic at peak times would create a very dangerous and volatile situation for any pedestrians and in particular children going to school particularly during dark Winter mornings .Riding a cycle would be extremely foolhardy in these circumstances .

3) The third consideration is regarding schooling in Weston, I am aware that WASPS has recently increased in capacity during the new build but given that most parents in Weston would like their child to go there it will just not be possible to accommodate them due to the extra numbers created by the new housing and will require onward transport to other schools in the city thus adding to my observations above.

**Change to the policy requested:**

I am strongly objecting to this proposal and request that you do not proceed with this flawed development for the reasons stated above .

**Respondent Number:** 5127 **Comment Number:** 1 **Respondent Name:** Mrs Leanna Biggs

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I object to the greenbelt land being used for housing development as this location is simply not suitable for the outlined proposal. It will increase the volume of traffic on the already overly used Lansdown Lane to an unacceptable level. There aren't the facilities in the village to cope with increased numbers in residency (as it can barely cope with the current numbers) and this development is NOT wanted by any of the existing residents.

**Change to the policy requested:**

My suggestion is to revisit/reconsider other, more suitable, areas for housing development, that will have a much lighter impact on residents and the countryside.

**Respondent Number:** 5128 **Comment Number:** 1 **Respondent Name:** Laure Airault

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

We do not want anymore development on the green belt as this will incur more traffic, more pollution and the green belt should stay untouched. Also Weston gets flooded when it rains a lot so having more houses built means more flooding .

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5131 **Comment Number:** 1 **Respondent Name:** Mr Keith Weller**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

The area CSA25 behind Napier Road is not just “releasing land from the green belt” it would also be “intrusion into the Cotswolds AONB”.

As such, I believe it would have a detrimental effect on the Cotswolds AONB, particularly the character of the Cotswolds escarpment and the Lansdown Plateau. This particularly applies when viewing from a distance such as from the Cotswold Way.

**Change to the policy requested:**

Omit this area from the plan so that the AONB is protected.

**Respondent Number:** 5135 **Comment Number:** 1 **Respondent Name:** MR AJ & DR K STEWART**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

Bath is rightly recognised as a UNESCO World Heritage City, it is not just the Georgian ‘set pieces’ that are that World Heritage City, the Royal Crescent, The Circus and the many other fine crescents and terraces that make up the City of Bath are ‘just’ the ‘jewels in the crown’. That Crown is the setting that makes Bath unique, that setting is what makes the City what it is. They are the hills surrounding the City.

Those hills include these green slopes that surround us on the western edge of the City, on the edge of the Cotswolds Area of Outstanding Natural Beauty. “Area of Outstanding Natural Beauty” again, “World Heritage City”: both apt and justifiably recognised and crucially important classifications.

The National Planning Policy Framework Section 9 draws particular attention to the need to protect the green belt.

So why on earth are B&NES Officers proposing that these sites should be built on?

Are you out of your minds?

You are not fit to practice in this City, you should be ashamed that you even thought it appropriate to suggest these sites be included.

**Change to the policy requested:**

Remove CSA25 from placemaking principles – land adjoining Weston.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5139 **Comment Number:** 6 **Respondent Name:** Mr & Mrs D. Perry**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

Constraints affecting the proposed strategic site allocation west of Lansdown Lane

The proposed strategic site allocation to the west of Lansdown Lane has a number of environmental and landscape constraints as follows:

- Bath World Heritage Site and World Heritage Site Green Hills Setting
- Conservation Area Setting
- Cotswolds Area of Outstanding Natural Beauty
- Existing natural springs
- Within zone of influence of SNCI and BAP
- Area with potential archaeological assets

Landscape and Visual Impact (on AONB and WHS)

The Landscape and Visual Study (LVS) Lower Slopes of Weston (Ove Arup & Partners, April 2013 (CD9/C07/1) has been used by the Council as part of the evidence base to assess the appropriateness or otherwise of selecting certain strategic site allocations. However, the report itself notes that "...it is assumed that the study area will accommodate development of residential character but due to the lack of more detailed information, it is not possible to thoroughly assess the magnitude or significance of effects..." (P.20). The LVS is intended to determine whether the development proposals are likely to be adverse or beneficial (p.1).

The land to the west of Lansdown Lane has been identified as part of the Bath to Beach Farm Escarpment character area. It forms part of the World Heritage Site and is part of the Cotswolds AONB. The LVS identifies that development here would have an adverse landscape impact and that the sensitivity of the landscape character here is high (p.22). The LVS notes that the site is visible from all viewpoints assessed and shows high sensitivity from the viewpoints with future development having an adverse impact on visual amenity. The report notes that any new development will have a negative impact on the AONB (p.31).

The WHS Setting and AONB Landscape and Visual Impact Assessment (LVIA) (CD9/LV/2) found that all effects of development were negative in the context of the WHS Setting and the AONB. The land behind Napier Road was determined to be of High and Medium Significance to the WHS Setting and the AONB.

With regard to impact of development, the LVS states that "Development within the lower slopes at Weston study area could adversely affect the Outstanding Universal Value, integrity, authenticity and significance of the World Heritage Site of Bath. This is due to the importance of the rural and undeveloped landscape setting of Bath that defines its Outstanding Universal Value and maintains and enhances local distinctiveness and environmental quality..." (P.32). Development of the land to the rear of Napier Road is identified in the Heritage Asset Study (CD9/LV1) as having a "medium negative significance" (eastern portion of field) and a "high negative significance" (western part of field) in terms of impact on heritage assets.

Despite the mitigation measures suggested in the LVS, the report clearly identifies that development on land on the lower slopes of Weston would have an adverse impact. The landscape sensitivity is high. There would be an adverse impact on visual amenity and there would be a negative impact on the AONB and WHS setting. We fully concur with these findings and consider that development on land to the west of Lansdown Lane would cause irrevocable damage to the WHS and setting and the AONB and have a hugely detrimental impact upon views from the Bath skyline. The NPPF (para 115) states that AONBs have the highest status of protection in relation to landscape and scenic beauty. Para 116 of the NPPF advises that major development in AONBs should only be allowed in exceptional circumstances.

Given the above, we consider that the allocation of this site and associated green belt boundary change (CSA26, CSA28 and CSA25) would not be justified on the basis that it fails to meet the environmental objective of sustainability. Due to

the extremely high landscape sensitivity of the site, we consider that the proposed allocation is not the most appropriate strategy when considered against reasonable alternatives (for example sites to the east of Keynsham which have far fewer environmental constraints and have been identified as safeguarded land for future development). Furthermore, we do not consider that exceptional circumstances which warrant major development in the AONB have been adequately demonstrated in accordance with the requirements of the NPPF.

#### Housing

In the Council's report BNES/51, the Council confirm that the main reason land is needed to be released from the Green Belt is to achieve affordable housing requirements over the plan period (para 3.28).

Proposed amendment CSA6 (1.26b) states that "The supply of market and total housing that will be delivered...is significantly greater than objectively assessed requirements. This is because the supply of market housing has been boosted to enable the delivery of the total affordable housing requirement."

We acknowledge the requirement of the NPPF (para 47) that "...local planning authorities should...ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.." But, we question the Council's approach of proposing green belt boundary amendments and strategic site allocations (e.g. that the subject of CSA26, CSA28 and CSA25) on highly sensitive land which is part of the WHS to achieve affordable housing requirements. The Council note in the amendments (CSA6, para 1.26c) that much of the supply of market housing is on sites that will not yield any affordable housing. Instead of proposing a strategic site allocation and green belt boundary amendment on highly sensitive land in Weston and in particular on land to the west of Lansdown Lane, it is considered that the Council should review existing sites and require affordable housing to be provided as part of any new development in order to achieve the affordable housing supply needed without altering green belt boundaries to achieve this.

Notwithstanding the above, should development go ahead on land to the west of Lansdown Lane (CSA26) careful consideration should be given to housing scale and density. To fit in with the character of the area development should be no higher than two storeys and have sufficient rear gardens/ amenity space. It is considered that this principle should be included in the Placemaking Principles (CSA25) and that significant landscape planting should be required on the boundary edges, particularly where development borders existing properties on Napier Road. Development of land adjacent to Napier Road should ensure rear gardens of new properties back onto rear gardens of existing properties (as per Placemaking Principle No. 2 of CSA25)

#### Green belt

The overarching objective of Green Belts is "to prevent urban sprawl by keeping land permanently open..." (NPPF, para 79). Stage 1 Green Belt Review (CD9/E2) identifies the parcels of land in Weston as important in terms of preventing the sprawl of Bath into the open countryside (p. 42). It also serves the purpose of protecting the countryside from encroachment, assisting urban regeneration and preserving the setting of the Bath WHS (p.42).

Stage 2 Green Belt Review (CD9/E9) notes that development of land behind Napier Road could be considered as sprawl of the urban area (p.21). It notes the AONB LVIA awards this land as having a high sensitivity value and it also notes the WHS LVIA has a medium value setting (p.21). As a general overview of land at Weston, the review states that the SHLAA advises that development would have a high impact on the distinctively rural character of the WHS which would be difficult to mitigate. The Green Belt Stage 2 review suggests that 110-120 m contour line could be a limit to development but notes that contour lines themselves are not appropriate for defining green belt boundaries.

Given the above and the sensitivity of the lower slopes of Weston, we object to the location of the strategic site to the west of Lansdown Lane and the associated green belt boundary amendment (CSA26, CSA28 and CSA25). We consider that there are other less sensitive locations within BANES which could accommodate additional residential development without compromising the sensitive AONB and WHS setting.

Notwithstanding the above, should this land be allocated for development, we consider that the suggestion on the Green Belt review of limiting development to the 110-120m contour line should be adhered to. When this development limit, together with other constraints, e.g. Geology, natural springs, WHS setting and AONB are factored in, we consider the land to the west of Lansdown Lane faces significant development constraints and is therefore unsuitable for the suggested quantum of development/extent of the strategic site allocation and that the allocation (CSA26) should be reduced in size taking into account these constraints.

#### Flooding and Geology

It is noted that the land to the west of Lansdown Lane is in Flood Zone 1 according to the Environment Agency's maps and passes the sequential test. However, the Water Infrastructure Report (CD9/13) notes that there are undocumented springs observed on the site (para 2.3). It also states that flood modelling has shown that there is a significant amount of surface water flooding which occurs alongside natural watercourses running through the site...<sup>1</sup>

It is considered that the Water Infrastructure Report fails to show an accurate picture of the run-off associated with natural springs which flow from the land north of Napier road into existing properties on Napier Road and further south onto Leighton Road. The springs are visible at certain times of the year and can be seen flowing freely. Some properties on Napier Road have been forced to find their own solution to cater for overland flow of these springs. Pumps and additional drains have been installed on certain properties to help mitigate the problem and ensure it does not lead to instability of existing properties. It is considered that a strategic site allocation for residential development north of Napier Road could have a significant impact on the flow of these springs and could potentially exacerbate existing problems experienced by residents of Napier Road. In this regard, it is considered that allocating this site fails the "Justified" test of soundness because it is not considered to be the most appropriate strategy for development when considered against alternatives. It is considered that more suitable locations for a strategic site allocation could be found.

We are concerned that if development does go ahead on this land, we could face significant problems in terms of increased flow from these natural springs which could impact our property. There does not appear to be any safeguards in place to cater for such an eventuality. Should the site allocation behind Napier Road be adopted, we request a full investigation into the impact on the natural springs prior to any development being approved and consider it essential that appropriate mitigation/compensation measures are in place to ensure that there is no impact on existing properties.

Furthermore, it is noted that there is an area of geological 'High Risk' of land to the north of Napier Road, where the area is underlain by Inferior Oolite. The report notes that "It is not recommended to develop the high risk areas...". Furthermore, Policy B3B (CSA25) (Land adjoining Weston Strategic Site Allocation) (Placemaking Principle 11) states "Avoid development of areas of High Risk in terms of slope or underlying geology, unless satisfactory remediation work can be demonstrated...". Notwithstanding our objection to this strategic site allocation, should the strategic site allocation be adopted as part of the Core Strategy, this aspect of Policy B3B is fully supported. It is necessary for a full ground investigation to be undertaken and to ensure that there is no detrimental impact on existing properties in close proximity to the site.

#### Ecology

It is noted that land to the west of Lansdown Lane is used by bats, as identified in the Dusk Bat Surveys (CD9/E14 and CD10/E9), in particular for commuting or brief foraging. We are also aware and (have first hand experience) of the existence of badgers (another protected species, which doesn't appear to have been investigated as part of the ecological surveys). The ecological survey (CD9/E13) also identifies hedgerows composed predominantly of native species which therefore meet the criteria for UK BAP Priority Habitat Hedgerows (para 3.1).

It is considered that the ecological value of land to the west of Lansdown Lane together with the key landscape and visual constraints provide further reasons why the proposed strategic site allocation (CSA26) and associated green belt boundary change should not form part of the Adopted Core Strategy.

#### Transport and Access

The Transport Access Statement (CD10/E8) notes that access to the site could possibly be achieved through demolition of dwelling or dwellings on Napier Road. It also states that the speed limit on Lansdown Lane would need to be reduced. The speed limit on the part of Lansdown going past the site is currently 30 m.p.h. Given the gradient of Lansdown Lane it is questionable whether cars would be able to accelerate up Lansdown Lane sufficiently without causing traffic problems at a speed less than 30 m.p.h, but clearly a lower speed limit is required to ensure the safety of any new access. Lansdown Lane is a key route out of Bath to the motorway network. It is considered that additional access onto Lansdown Lane both to the east and west and additional traffic associated with the proposed strategic site allocation could have detrimental transport and highway safety issues and in this regard we consider that proposed strategic site allocation and associated Green Belt Boundary amendments relating to land to the west of Lansdown Lane (CSA26, CSA28 and CSA25) should be discounted.

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Furthermore, it is considered that significant highway safety and parking issues would be caused for one of the local primary schools (Weston All Saints) as a result of additional development on land in Weston generating additional pupil numbers needing to attend the school. The existing access and parking situation on Broadmoor Lane during the morning drop off and afternoon collection periods already causes significant safety concerns (for pedestrians and motorists). Any further development leading to an increase in pupil numbers for this school is likely to significantly worsen the already dangerous situation and in this regard should be resisted.

### Discounted sites

It is noted that seven alternative strategic site allocations were considered and discounted. With regard to sustainable development, NPPF (para 152) states that “Local authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued...”

Given the very significant environmental constraints of the land to the west of Lansdown Lane, it is not considered to be the most sustainable location for future development from an environmental perspective and in this regard development of this site would not be in accordance with para 152 of the NPPF. Given this and the concerns described in this submission, we consider that other less constrained sites such as further development on to the east of Keynsham (i.e. the land proposed to be safeguarded for future development under CSA35) or Bristol (Hicks Gate) (which is not identified as a discounted site, but was reviewed by the Council (see Council report of 4th March 2013) should be allocated for development instead.

It is noted that these sites also have constraints, but it is considered that they have fewer constraints than the proposed allocation on land to the west of Lansdown Lane (CSA26, CSA28 and CSA25) which has such significant constraints and would have a fundamental detrimental impact on the WHS site and setting of Bath, the Cotswolds AONB and major hydrological issues.

### Conclusion

Given the significant environmental and landscape sensitivities of the site, including the WHS, AONB, hydrological issues etc, we do not consider that land to the west of Lansdown Lane is the most sustainable location for future residential development/strategic site allocation and associated Green Belt boundary amendments and that there are other more suitable alternatives. In this regard, we consider that the proposed amendments CSA26, CSA28 and CSA25 fail tests of soundness and do not comply with national policy in terms of selecting the most sustainable locations from an environmental perspective. In this regard, we request that the strategic site allocation to the west of Lansdown Lane and associated Green Belt Boundary amendments are deleted from the Core Strategy.

In addition, we consider that the Council failed fundamentally with regard to public consultation associated with the original identification of land to be removed from the Green Belt and the current proposed amendments in relation to the green belt boundary change and strategic site allocation of land to the west of Lansdown Lane. The Council failed to follow their Neighbourhood Planning Protocol and relevant elements of the NPPF relating to public consultation. In this regard, the proposed amendments CSA26, CSA28 and CSA25 are not consistent with National Policy and should be deleted.

### Change to the policy requested:

Amend CSA25 (Policy B3B) to remove reference to land to the west of Lansdown Lane and delete the Placemaking Principles relating to the land to the west of Lansdown Lane.

Development of land adjacent to Napier Road should ensure rear gardens of new properties back onto rear gardens of existing properties (as per proposed Placemaking Principle No. 2)

**Respondent Number:** 5140 **Comment Number:** 1 **Respondent Name:** Mr Jim Phillips

**Respondent Organisation:** Broadmoor Lane Residents' Association

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

Support:

We object to the Weston Strategic Site Allocation proposal on the four following grounds, as described below: (1) Lack of local and comparative assessment in terms of impact on Green Belt; (2) Landscape and visual impacts; (3) Ecological concerns; (4) Transport/sustainability concerns.

**1.0 Lack of assessment of impact on Green Belt**

As set out in Para 1.4 of Planning Policy Guidance 2 (PPG2), and Para 79 of the National Planning Policy Framework (NPPF), the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness and permanence. The purposes of the Green Belt as set out in Para 1.5 of PPG2, and Para 80 of the NPPF, are:

1. To check unrestricted sprawl of large built-up areas
2. To prevent neighbouring towns from merging into one another
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic towns
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land

Whilst we note that B&NES have undertaken a Green Belt review (Arup, April 2013), this does not appear to address the purposes (1-4) at a local enough scale to warrant selection of one site over another. Furthermore, the Green Belt review makes no scoring comparison between areas, so it is not possible to compare sites. There is also no selection process for choosing one site against another. As such, the sites selected for removal from the Green Belt have not been considered fairly with all other Green Belt sites in the authorities' administrative area. It is our view that a sound review of the Green Belt would require that B&NES score all land within the Green Belt against the four key criteria listed below.

By restricting development in the surrounding countryside, any Green Belt land contributes to the purpose 5 above and therefore purpose 5 applies equally well to all Green Belt land. However, assessment of all potential Green Belt sites proposed for development must be assessed against the first four remaining Green Belt purposes. All defined parcels of land within the Green Belt must be assessed and scored against the criteria as described below.

Whilst it is not our role to undertake the scoring on behalf of the council, and individual sites should not be looked at in isolation, it is our view that the sites proposed within the Weston Strategic Site Allocation are highly valuable with respect to at least three of the criteria (namely, purpose 1, 3 and 4) and would therefore not be considered as suitable for removal from the Green Belt. Moreover, as regards purpose 5, it is unclear from the proposal whether there are urban sites which may be available for development as an alternative to the identified sites: by purpose 5, land should only be removed from the Green Belt as a truly last resort.

**Purpose 1- Restrict Sprawl of Urban Areas**

One of the Green Belt purposes is to check the sprawl of built-up areas. Urban sprawl is seen as the creeping advancement of development beyond a clear physical boundary of a settlement. Where the Green Belt is adjacent to a clear physical boundary defined by built form, the landscape performs a role in safeguarding against unrestricted sprawl (scoring 1). In contrast, a land parcel which lies away from built development within the countryside would contribute less to this purpose (scoring 0).

**Purpose 2 - Prevent Towns Merging**

This purpose is concerned with preventing neighbouring towns from merging into one another and seeks to avoid coalescence of built form. Coalescence can be perceived or actual, and physical or visual. Some areas of land contribute more effectively in maintaining separation than others depending on the local environmental or site conditions, such as topography and tree cover. An open, expansive landscape which contributes towards significant separation between two settlements will contribute less in terms of anti-coalescence (scoring 0) whereas a land parcel which forms a narrow gap between two settlements would have a significant anti-coalescence role (scoring 1).

**Purpose 3- Safeguarding the Countryside from Encroachment**

In terms of safeguarding the countryside from encroachment where there is a presence of development 'washed over' by

the designation, the Green Belt is effective in restricting further encroachment. In contrast, where surrounding land is clear of development with the exception of occasional buildings and farms, the Green Belt contributes little to restricting encroachment into the countryside (as development is already absent). Existing developed areas would score 1 whereas land with an incidental human presence would score 0.

#### Purpose 4 - Preserve Setting and Character of Historic Towns

This purpose relates to the setting and special character of historic towns. Conservation Areas associated with towns and villages within B&NES should be considered significant when assessing land parcels against this purpose. Consideration should be given to the geographical extent and historic setting of the Conservation Area designations. Where a land parcel is considered to contribute to the preservation of a historic setting, a score of 1 should be given and where the land parcel does not, a score of 0 should be given.

In summary, we deem the present proposal to be premature and ill-considered, given lack of robust assessment for purposes (1-5) of Green Belt policy.

#### 2.0 Landscape and visual impact assessment

The sites proposed for removal from the Green Belt at Weston are highly visible in the landscape and are located on a prominent hillside. These sites fall within the Bath World Heritage Site and the Cotswolds Area of Outstanding Natural Beauty (AONB), and are overlooked by the Grade I Listed Beckford's Tower. The study undertaken by Arup, Landscape and Visual Study Lower Slopes at Weston April 2013 states the following:

'The Weston character area is characterised by the historic core of Weston which lies on the valley bottom with post war development extending up the north side of the valley allowing views to the south. There are numerous views towards the undeveloped hillsides and in particular Kelston Round Hill just outside the character area. The landscape sensitivity of this landscape character area is considered to be medium. The undeveloped hillsides provide an important backdrop to this residential area. Key characteristic features of the rolling hills and hedgerows would be permanently impacted on by development within the study area'.

Considering the assessment identifies these sites as having 'medium' sensitivity and development having a permanent impact on the landscape it is unclear why these sites have been selected as being suitable for development. Again, we feel that a sound review of the Green Belt would require that the proposed sites for removal be compared and scored against other sites within the Green Belt. As it stands, it is not clear if there are sites with higher levels of impact or lower levels of impact.

We believe therefore that present assessment of the Weston Strategic Site Allocation is inadequate, and that assessment of the sites against other sites would need to be undertaken so that a more informed selection procedure could be presented.

#### 3.0 Ecological concerns

We have further ecological concerns regarding impact on European protected species, namely bats. A preliminary ecological survey and assessment has been undertaken which covers the proposed sites (BRERC, June 2013). A bat survey was also undertaken by Batpro (summer and autumn, 2013). These surveys included specific surveys for greater horseshoe bat as part of the assessment in relation to the Bath and Bradford on Avon SAC for this species. Surveys were undertaken during July and September. Whilst it is accepted that these surveys were only preliminary surveys, they do make the following conclusion 'The results suggest that development should be able to proceed within the identified Possible Housing Allocation area, if appropriate mitigation measures are implemented'.

Members of our group include professional ecologists and licensed bat surveyors and they have advised that the level of survey undertaken is not robust to make such a statement. Surveys for greater horseshoe bats (and other bats species related to major development) should be undertaken over at least a whole season, with at least one or two surveys every month between May and September, which should be supplemented by static monitoring. The current surveys fall considerably short of the advice and guidelines provided by The Bat Conservation Trust Good Practice Guidelines, 2012 (Table 7.2 survey effort). We feel that the assessment for bats is not robust, and the statement made in the report (above) is not backed up by sound survey methodology. As bats are European protected species, any potential impact on bats resulting from proposed development are a material consideration in the planning process. We feel at this stage that the council cannot adequately determine if there would be an adverse impact on the local population of bats from the proposed development, as the level of survey that has been undertaken is not robust and not in line with current guidance

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and good practice. Furthermore, the statement considers that adequate mitigation measures could be put in place to compensate for the impact on bats, but again it is argued that this cannot yet be determined, as the level of survey undertaken is not robust to determine the use of bats across the whole active season – therefore how can suitable mitigation be determined. Our advice is that further bat survey would be required before these sites could be considered for removal from the Green Belt and for proposed development.

**4.0 Transport/sustainability**

We have concerns with the identified sites with respect to sustainability, in that homes built in the outer reaches of Upper Weston would be remote from amenities and offer poor pedestrian and cycling routes. In particular, the proposed pedestrian access routes onto Lansdown Lane have a steep gradient and poor protection from heavy commuter traffic, acting as disincentives for non-vehicle transportation.

**Change to the policy requested:**

At this stage we are not requesting any specific changes as we feel this would be premature. Our view is that the process that has been undertaken to identify sites is fundamentally flawed based on four key areas as outlined above:

- Lack of local and comparative assessment in terms of impact on Green Belt;
- Visual and landscape impacts;
- Lack of robust evidence for ecological impacts;
- Transport/sustainability.

**Respondent Number:** 5141 **Comment Number:** 1 **Respondent Name:** Councillor Malcolm Lees **Respondent Organisation:** BANES Councillor  
**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**Support: 

- Lack of assessment of the impact on the Green Belt & AONB
- Lack of compliance with the National Planning Policy Framework Core Planning principle – 9 Protecting Green Belt Land
- Lack of consideration for edge of town development (sustainability) with new homes being remote from local shops and services

**Change to the policy requested:**

- Compliance with the NPPF, in particular Core Planning Principle 9 Protecting the Green Belt Land
- The Authority has not shown that it has adequately considered other sites within BANES for development before encroachment into the Green Belt around Bath .
- The Authority has mistakenly considered that Bath should be “maxed out” for new home development in preference to other sustainable developments in the rest of BANES.

**Respondent Number:** 5144 **Comment Number:** 1 **Respondent Name:** K Blake & Mrs A. Blake. **Respondent Organisation:**  
**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**Support: 

With reference to the above mentioned developments my wife and I would object to this going ahead with regard to the following issues----

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- a) Taking into account the steepness of the ground and also springs in the area, once the roads and housing are in place, there is a potential for surface water flooding. What guarantees would be given that this would not happen?
- b) There is a potential for traffic from these developments to enter Lansdown Lane on to one of its narrowest parts, bearing that this LANE is used as a through route to the M4&A420 etc.it could make a bad situation worse. Bearing in mind there are approximately 3.5 million traffic movements per year as determined by a traffic survey.
- c) This land and its hedgerows provide an ideal habitat for wild life, including badgers, foxes, deer, woodpeckers and a host of small birds.
- d) Brownfield sites should be looked at more closely for development potential before taking the easy option onto greenbelt land. Once its gone its gone !!

**Change to the policy requested:**

**Respondent Number:** 5149 **Comment Number:** 1 **Respondent Name:** Richard & Jennifer McMullan **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

We wish to object to the proposal to remove the two sites in Weston from Green Belt and to allow development on these sites.

We believe the proposal to remove land from the Green Belt is inconsistent with the National Planning Policy Framework Section 9 which serves to protect the Green Belt. Building on these sites, on protected hillside within an area of Outstanding Natural Beauty would be detrimental to the skyline, landscape and setting of the World Heritage City. We also have concerns about the sustainability of these sites, with poor pedestrian & cycle links to existing amenities. The plans will also cause considerable further traffic hazards in an already dangerous area by Weston all Saints School in Broadmoor Lane. (It is only a matter of time before a child is killed or seriously injured in this area). Please take some notice of these comments.

**Change to the policy requested:**

**Respondent Number:** 5150 **Comment Number:** 1 **Respondent Name:** Rowland Bartlett **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

**Support:**

This proposed development demonstrates what malicious damage and blatant disregard to our beautiful green belt and contravenes National Planning Policy Framework (NPPF) Section 9.

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In addition, having regard to the increase in the danger of traffic in Lansdown Lane – which is estimated at over 3 million at present, with little provision for the safety of pedestrians & children at the local school.

We are experiencing major problems, and have gone to a great deal of expense to overcome the leakage of the natural springs within the hillside. We believe any new development would exacerbate the danger and de-value our current property.

Several years earlier planning permission was denied because of the same problem.

The Lansdown Skyline was maintained by previous developers who were constrained to only building bungalows on the Northside of Napier Road. Finally we believe that this application should be thrown out to maintain the foregoing problems and attributes.

**Change to the policy requested:**

Leave Green belt land alone.

**Respondent Number:** 5151 **Comment Number:** 1 **Respondent Name:** Mrs Dinah Gill  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Plan for Weston Objections

1.I strongly object to land designated as Green Belt to be used for building. There are lots of Brownfield sites that could be used

2.Access onto Lansdown Lane. It is already a death trap & will become more so. Cars will have to be used – people won't walk or cycle. Public transport too expensive

**Change to the policy requested:**

**Respondent Number:** 5151 **Comment Number:** 1 **Respondent Name:** Mrs Dinah Gill  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Plan for Weston Objections

1.I strongly object to land designated as Green Belt to be used for building. There are lots of Brownfield sites that could be used

2.Access onto Lansdown Lane. It is already a death trap & will become more so. Cars will have to be used – people won't walk or cycle. Public transport too expensive

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:****Respondent Number:** 5155 **Comment Number:** 1 **Respondent Name:** Mr David Morris  
**Agent ID:** **Agent Name:****Respondent Organisation:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:** Land adjoining Weston (General)**Comment made on the Proposed Change:**Support: 

1. Weston village is already used as a main route for traffic through to the M4, Bristol and Chippenham this makes lansdown lane a main traffic route.
2. Weston is well known for flooding additional housing will exacerbate the situation
3. Weston Primary school The school is already over crowded any the increase in pupil size will affect all childrens education
4. The facilities eg shopping is already inadequate for the present residents, the present arrangements for parking for any of the present residents for access to any facility is already restricted.
5. It is debatable whether the drainage system for water and sewage in the areas would support any additional housing. The field behind Napier Road was turned down by planning in 1966. At the time the Swindon builder put in smaller drains because planning was refused.
6. many house purchasers in the proposed area bought because of its green belt status. This proposal will reduce their house resale value.
7. The proposed entrances the sites in lansdown lane where traffic is concerned will be an accident waiting to happen .

**Change to the policy requested:**

I believe the application for any further housing should be turned down for the reasons stated above.

**Respondent Number:** 5162 **Comment Number:** 1 **Respondent Name:** Tye & Davis**Respondent Organisation:****Agent ID:** 193 **Agent Name:** Planning Potential Ltd**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA25 Land adjoining Weston (General)**Location:****Comment made on the Proposed Change:**Support: 

1.0 THE SITE AND SUROUNDING AREA  
(See also Appendix 1 Photographs, and Appendix 2 Visual/Heritage Assessment, sketch maps and sketch views)

Bath is one of the most beautiful Cities in Europe and was designated a World Heritage Site in 1987. An important characteristic of the World Heritage Site, as identified in The City of Bath World Heritage Site Setting Supplementary Planning Document, Adopted August 2013, are the attractive approaches to the City that are based on historic routes and its attractive green setting.

The approach to the World Heritage Site, Bath, and the historic settlement of Weston, down the historic Lansdowne Lane from the Cotswold plateau, is an example of an important entrance into the City. This entrance helps reinforce the unique setting of the World Heritage Site, the City, and Weston, and in particular emphasises the importance of the rural approaches into the City from the surrounding countryside and its compact nature.

The greater part of Weston has been described in the past as like a, “ grand amphitheatre” the village lying in the valley and the hills rising on three sides, the other side open to the south. It would be appropriate to also add, a green amphitheatre, because of the countryside and its important green setting.

The Weston area has been inhabited since before Roman times, the historic settlement is now centred on All Saints Church. The current church dates from 1832 and was designed by the local architect John Pinch the younger, except for the tower, which dates from the 15th century. The village expanded during the Georgian /Victorian Period and was incorporated into the City of Bath in 1879. The Bath Extension Act made a further revision of the City/Parish boundary in 1950. In the 20th century housing continued on the lower valley slopes of the Weston valley along Lansdowne Lane, finally stopping at Green Acres and Napier Road. This prevented further urban sprawl into the countryside and also safeguarded the setting of the World Heritage Site.

Lansdowne Lane is identified on the 1846 Tithe map but appears of earlier origin, perhaps based on an ancient track way down from Lansdown, and the Cotswold plateau, into Weston.

In the book, “ Two Thousands years in the life of a Somerset Village, Weston, Bath.” by John Hargood 2001, reference is made to the tithe terrier of the seventeenth century and, “...dividing the arable lands of the Parish into East and West field, the dividing line being Lansdowne Lane (then Tibbotts Lane) and the present Penn Hill then known as “Bickmans Lane”.

Further reference to a visit to Bath, via Weston, in 1703 by Queen Anne is also made in the above book. It is noted that due to the difficulty of using the track over Lansdown to Bath that, “ The City provided for the safety of her majesty by widening and levelling the old bridle road from the Down to the via Julia. This was old Tibbotts Lane.”

Royal visits, especially by Queen Anne who visited Bath to take the waters, increased the fame and attraction of Bath. Such visits set in motion the period of development that led to the great rebuilding of the City in the 18th century.

The approach to the World Heritage Site from the north, and down Lansdown Lane, is dramatic, scenic, and unique. The lane twists down from the Cotswold Plateau affording an impressive sequence of views over surrounding countryside and then over the City/Weston.

Entering the City from the countryside, and the consequent marked change in character between countryside and urban development is perhaps better appreciated from this approach than the alternative route across the Cotswold Plateau, via Lansdown Hill, then into Bath. The approach via Lansdown Hill passes the racecourse, a number of playing fields either side of the road, the Councils Park and Ride, and then land developed by the M.O.D, near Beckfords Tower, before descending down into the City. The approach down Lansdown Lane, in contrast, retains agricultural fields for the most part each side of the Lane, and no significant development, until one reaches the clear urban boundary to the City created by Green Acres and Napier Road.

This marked contrast between undeveloped/attractive open countryside and the built up area of the City/Weston, identified by the sharp change from high quality rural to suburban houses at Green Acre, and Napier Road, reinforces the distinctive characteristic compact character of the City and the importance of preventing urban sprawl further up and along the valley slopes, as proposed.

This important gateway into the City, and setting of the World Heritage Site, is rightly protected at present from inappropriate development/urban sprawl by the designation of the approach from open countryside as Green Belt, and also its inclusion in the Cotswold Area Of Outstanding Natural Beauty. The sites proposed for development also lie within the boundary of the World Heritage Site.

To the east of Lansdowne Lane, and the site proposed for development north of Green Acres, lies Upper Weston Farm,

which together with the proposed development site off Eastfield Avenue, are located within the Bath Conservation Area. The Bath Conservation Area may be regarded as of international importance because it is included within the World Heritage Site.

Another significant feature of the historic landscape in this area includes the outlying historic farmsteads, such as Heather Farm and Upper Weston Farm. The farms are located in close proximity to all the proposed development sites.

Gerald Schuch in his book, "Weston Estates in the 19th century." 1992, notes among the most prominent landmarks in Weston in 1800 were, "...the Parish Church and Weston House (the Manor House). Farmhouses included: Halfway House on Kelston Road. Mr Scudamore's (Chelscombe Farm), Upper Weston Farm, Heather Farm and the Chapel Farm on Lansdown....Weston was a rich rural parish with mostly pasture land on the slopes .."

One of the prime changes which occurred to the rural landscape during the Georgian period was also the results of the Enclosures Act, where larger fields were divided up by hedges to mark field boundaries. The present landscape on the valley slopes includes hedgerow boundaries and these may reflect this important period in the changing landscape surrounding Bath.

Farmsteads in the outlying areas of Weston were probably focused historically on the surrounding countryside and when occupied in the Georgian/Victorian period would have provided an important source of food for the growing City of Bath.

The barn at Heather Farm is listed Grade II and is noted in the statutory list as possibly dating from 1688 remodelled in the 19th century. Attached to the barn is the historic farmhouse and around the yard are a number of historic farm outbuildings. The farmhouse may also be regarded as listed by the Local Authority, and the Planning Inspector, as it is attached to the listed barn, historically associated with it, and it appears to be within the same ownership.

A close inspection of Upper Weston Farmhouse was not possible as it lies on private land but it is noted on the 1840 Tithe map and may also be of an earlier date, perhaps also dating back to the 17th century as Heather Farm. Although not listed it is clearly of some historic interest, especially when seen in the context of the character of this part of the countryside and the study of historic farmsteads in the area. It may be regarded as an undesignated heritage asset.

The undeveloped fields/spaces leading up to the farmsteads and surrounding them enhances the setting and the approach into the World Heritage Site, Bath, Weston, the character of the Green Belt, Area Of Outstanding Natural Beauty, the Conservation Area and its setting. The fields/open spaces reinforce the areas local identity, sense of place, distinctiveness. They provide an important historic context for the World Heritage Site and the City.

Beckfords Tower, located on the edge of the Cotswold Plateau, is of outstanding historic and architectural merit and is listed Grade I. It is also located within the World Heritage Site, Green Belt, Area Of Outstanding Natural Beauty, and the Bath Conservation Area. It overlooks open countryside and the higher / lower slopes of the Weston valley, it is clearly an important Georgian and rural landmark

The 120-foot neo – classical Tower was built for wealthy eccentric William Beckford as a study retreat, which housed part of his collection and library. Today it contains a museum collection on the first floor illustrating his life and interests. Visitors can climb up the newly restored Tower into the Belvedere for panoramic views over Bath countryside.

Beckford Tower can also be viewed from the site proposed for development north of Green Acres, and also when looking up and over the steep south facing slope of the site to be developed off Eastfield Avenue, from the surrounding streets.

The fields/open spaces proposed for development either side of Lansdown Lane, are on rising valley slopes. Any development on these areas, in particular the site north of Green Acres which lies on the highest valley slope, will be seen from various locations in the surrounding countryside, in particular from higher viewpoints looking down and across the site.

The City of Bath World Heritage Site Setting Supplementary Planning Document, Adopted August 2013, provides in Map 4 a coloured Contour Map of the World Heritage Site and the immediate surrounding area. It appears to show the field to the north of Green Acres within the 100mm to 149mm colour banding, the existing development to the south, Green Acres, falling within the 55mm to 99mm contour banding. A significant increase in height of some 50 meters.

Although the site proposed for development off East Field Avenue is on a lower valley slope it lies on a prominent steep slope and reinforces the important open nature of the countryside where it abuts the urban edge of the City. The site also lies within the Bath Conservation Area.

In the immediate outlying countryside are a number of public rights of way, which follow the edge of the Cotswold Plateau to the north, northeast, and then lead down into Weston. Further to the west, and across the valley on higher ground, lies the Cotswold Way that provides views back across the valley and over Weston.

Although public rights of way do not appear to cross the proposed development sites, it must be acknowledged, as noted in The City of Bath World Heritage Site Setting Supplementary Planning Document, Adopted August 2013, and guidance from Central Government and English Heritage, that contribution to setting of heritage assets does not only depend on public access. For example the views from the farm access up to Upper Weston Farm, from Lansdown Lane, although not accessible by the public are important to assess due to their proximity to the World Heritage Site and the City, as are those obtained from the proposed sites to be developed over and across surrounding fields, features, and countryside, and from the adjacent, as well as more distant fields, that look across and over the proposed development sites.

## 2.0 LEGISLATION /POLICY/GUIDANCE

### The Planning Listed Buildings and Conservation Areas Act 1990

Sections 16 and 66 of The Planning Listed Buildings and Conservation Areas Act 1990 lays down statutory requirements for undertaking works to listed buildings and their setting. Section 66 (1) notes that “.....the local authority or, as the case may be the Secretary Of State, shall have special regard to the desirability of preserving its features the building or its setting .....”

Section 69 notes that Conservation Area are “...areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance....”

### Circular on the Protection of World Heritage Sites. 07/2009

Paragraph 10 of the above circular states that, “Policies for the protection and the sustainable use of a particular WHS should apply both to the site and, as appropriate, to its setting, including any buffer zone or equivalent.

The National Planning Policy Framework, Local Plan Policies, The City of Bath World Heritage Site Setting Supplementary Planning Document, and guidance provided by English Heritage, emphasises the importance of the resisting inappropriate development in areas of high historic value and landscape quality. The desirability of enhancing such areas is also advised.

### The National Planning Policy Framework states: -

Section 9, “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristic of Green Belts are their openness and their permanence...”

Section 11, “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest protection in relation to landscape and beauty ...”

Section 12, Paragraphs 132, 133 and 134 refer to such aspects as, “... when considering the impact of proposed development on the significance of a designated heritage asset that great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. ... Where a proposed development leads to substantial harm to or total loss ...that local planning authorities should refuse consent, unless it can be demonstrated that substantial public benefits that outweigh that harm or loss...Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this weight should be weighed against the public benefits of the proposals.”

Planning for the Historic Environment Practice Guide, produced by English Heritage for PPS5 remains a valid document, and refers to guidance on development impacting heritage assets and their setting.

### The World Heritage Site Management Plan. 2010 -2016

Paragraph 2.4.20 of the Management Plan states, “The landscape surrounding the city provides the setting to the site and as such is highly significant. The City sits in the hollow of the river valley and surrounding hills offer views across the site. Skylines, vistas and panoramas are therefore significant elements, as are approach routes, waterways, trees and woodlands. The stone from which the City is built was mined from the surrounding hills, creating an important physical relationship between the geology and the appearance of the City. The surrounding countryside is important and attractive in its own right, much of it being designated as the Cotswolds Area of Outstanding Natural Beauty...”

The Bath and North East Somerset Adopted Local Plan has relevant policies: -

Policy GB.1 “Within the Green Belt, as shown on the proposals map, permission will not be given, except in very special circumstances.....”

Policy NE.2 “Development which adversely affects the natural beauty of the landscape of the designated Areas of Outstanding Natural Beauty will not be permitted...”

Policy BH1. “Development, which would harm the qualities, which justified the inscription of Bath as a World Heritage Site or which would harm the setting of the World Heritage Site, shall not be permitted.”

Policy BH2 “Development affecting a listed building or its setting will not be permitted where it would ... (V) not adversely affect the building's contribution to the local scene including its role in any architectural composition”

Policy BH5 “Development which affects a building or structure on the list of locally important buildings will only be permitted where... (ii) the contribution to its context, local interest, or historical associations is not adversely affected.”

Bath and North East Somerset Council does not have a formally adopted list of locally important buildings, or a Supplementary Planning Document, which would support the above policy. However, such farmsteads as Upper Weston Farm are of sufficient interest to merit consideration as undesignated heritage assets, under the guidance given in the National Planning Policy Framework, and therefore the impact of proposals should be assessed bearing in mind the above.

Policy BH6 “Development within or affecting a Conservation Area will only be permitted where it preserves or enhances the character or appearance of an area ... Particular attention will be given to ... (V) the need to protect existing trees and landscape which contribute to the character or appearance of the Conservation Area...”

Bath World Heritage Site Setting Supplementary Planning Document

The City of Bath World Heritage Site Setting Supplementary Planning Document, Adopted August 13, emphasises such factors as the importance of the green setting to the World Heritage Site, and that it is a key to understanding the significance of the City, the importance provided by topography and land use including the green undeveloped farmland/green spaces, and the approaches into the City along historic routes.

Map 5 on page 36 of the above document identifies Green Hill Sides Forming Prominent Features of the Landscape Setting of the World Heritage Site. The

the fields proposed for removal from the Green Belt lie within the above Green Hill Sides. The fields are also identified as being visible from significant viewpoints, for example Prospect Stile, Twerton Round Hill, and Kelston View, (see maps 8a, Area visible from the viewpoint at Prospect Stile, 8p, Area visible from the Viewpoint at Twerton Round Hill, and 8v, Area visible from the viewpoint at Kelston View.)

### 3.0 THE CASE AGAINST REMOVAL OF THE FIELDS FROM THE GREEN BELT AND HOUSING DEVELOPMENT.

THE HARM CAUSED TO THE SETTING OF THE WORLD HERITAGE SITE, GREEN BELT, COTSWOLD AREA OF OUTSTANDING NATURAL BEAUTY, CONSERVATION AREA AND OTHER HERITAGE ASSETS.

As noted previously an important feature of the approach to the City, along Lansdown Lane, is its green setting. Furthermore the sites proposed for development have been identified as included within, “Green Hill Sides Forming Prominent Features of the Landscape Setting of the World Heritage Site” and also visible from significant viewpoints, in the Bath World Heritage Site Setting Supplementary Planning Document.

The removal of the sites from the Green Belt and their development will cause substantial harm to this important rural approach into the World Heritage Site, City, and Weston. In particular concerns are raised with the choice of the two sites

either side of Lansdown Lane because they are located in close proximity to each other, on either side of an attractive historic route into the City, and on rising valley slopes .

The site to the north of Green Acres is in fact located on the highest of the three sites, in an elevated location, and its development will appear particularly prominent and visually incongruous.

In assessing the desirability of including the sites adjacent Lansdown Lane for housing account must also not only be taken of the adverse visual impact of the houses but also the visual impact of associated highway requirements.

Unfortunately proposals for development are still vague. The drawing of a line to outline areas to be developed for housing does not show the full visual impact of development, or the visual harm that will be caused. For example the visual impact of highway requirements are still unknown but it is suggested the works required will be significant and cause substantial visual harm in their own right to the rural character of this approach into the World Heritage Site, and the character of the A.O.N.B at this point.

It is understood that the Council is considering 50 houses per development site. However, no matter what the final figure is chosen the new vehicular access points with their standard visibility splays, hard surfaces, pavements, and the requirement for lighting on the new housing sites, and no doubt increased/improved street lighting on the lane, will cause harm to the character of the area. The requirement for lighting will also impact on the character of the area at night time, as well as during the day, when viewed from close by and at a distance.

The new housing development may also result in the need for further highway signs, and warnings marked on the lane itself, in particular further up Lansdown Lane and the attractive entrance into the World Heritage Site/ City. Highway signs and road markings, which, no matter how well designed to reduce their impact, will create additional highway visual clutter that will detract from this important rural approach into the City.

Important features of the approach into the City from Lansdown Lane are the existing boundaries to the fields/green spaces. The stone walls, grass banks/verges and hedges also provide a sense of visual enclosure to the lane and reinforce its rural character. Existing historic access points from this lane are for the most part restricted in width enhancing the approach and its rural character. For example the historic vehicular access to Heather Farm appears to be via a narrow entrance between historic farm outbuildings facing onto the lane.

The new access points would significantly breach this sense of visual enclosure and cause substantial harm to the rural approach into the City, the setting of Heather Farm, and the wider /approach setting of Upper Weston Farm and the Conservation Area.

Even if vehicular access to the site north of Napier Road could have been achieved from Napier Road substantial harm would still have been made to the setting of the Heather Farm when viewed from the surrounding area, but in particular from within the field to be developed and the fields adjacent to it.

In the winter months when the leaves fall from the hedge bordering the field to be developed north of Green Acres, the boundary becomes more permeable. Glimpses can then be viewed though the hedge to the field and open countryside beyond. These views reinforce the rural approach to the City and the clear visual edge between countryside and the existing urban development at Weston.

The above view also demonstrates the significant change in height from the lower level of Lansdown Lane to the height of the field to be developed, and its elevated position above the lane. Significant engineering works, as already identified by the highway section of the Council, will therefore need to be undertaken to create an access onto the higher levels of the field, through the hedge, and it is suggested to also create satisfactory visibility plays with resulting harm to character.

The need to consider the visual impact of the sites proposed for development at all times of the year, not just during the summer months, is emphasised. In winter months views over to the development sites, and views out from them, become more open due to the leaf fall from trees and hedges.

Notwithstanding objections in principle to the development of all the sites identified at Weston it is maintained that the density of development is too high. The impact of development needs to be minimised because of the green setting and

openness of the countryside at this point.

The cumulative adverse visual impact of in particular the two sites adjacent Lansdown Lane should not be underestimated. The new housing sites are located in close proximity to each other and therefore their cumulative visual impact, the harm caused, will be increased when viewed at close hand and from a distance.

Placemaking Principles and Mitigation measures proposed by the Council include tree planting, high quality design, and reducing the impact of lighting but these proposals will not overcome the harm that will be caused by developing what is essentially open green spaces /fields, which are located in a highly sensitive area. In the absence of detailed proposals the significance of the above measures cannot also be easily tested and relied on, and should therefore be given little weight.

It may also be argued that such undeveloped green spaces/open fields add to the sense of place of an area, and its identity. Placemaking should also be about trying to identify, conserve, and enhance such important green spaces not proposing development on them.

The tree planting proposed will also take some time to establish. On both sites, to the west and east of Lansdown Lane, the areas to be planted also appear to be on lower ground than the sites proposed for housing. Their effectiveness will therefore will be reduced, at the very least in the short term, especially when viewed from higher ground within the Area of Outstanding Natural Beauty and from the surrounding countryside. In the winter months their effectiveness will also be reduced.

It may also be argued that the additional planting proposals will cause harm in their own right by detracting from the relative openness of the views which can already be obtained across and between fields, and features, at these points at present. Views that are also a characteristic feature of the area.

Another attractive aspect of the approach into the World Heritage Site /City at this point, and the character of the surrounding valley slopes, are the historic farmsteads associated with the outlying areas of Weston. The fields and farmsteads combine to contribute to the character and setting not only of the World Heritage Site but also the Conservation Area, which is located to the east of Lansdown Lane, the A.O.N.B, and the openness of the Green Belt.

The farms and the fields that surround the historic farmsteads, as noted previously, are also an important demonstration of the historic land use of the area and would have probably provided important food for the growing population in the City during the Georgian and Victorian period. The enclosed fields perhaps date back to the time of the Enclosure Acts and the Georgian period.

The development of in particular the field to the north of Green Acre's, and north of Eastfield Avenue, will have a substantial adverse impact not only on the setting of the World Heritage Site but on the setting and character of the Conservation Area.

In contrast to Lansdown Lane, a less well used route but nevertheless an attractive and historic approach into the World Heritage Site and the Conservation Area, is via the access to Upper Weston Farm from Lansdown Lane, which crosses open fields and countryside. From the farm access attractive views are obtained towards the City and over the field to be developed north of Green Acres. From the field itself views can be obtained into surrounding countryside and up and over to Beckfords Tower. Development on this highest of the valley slopes will clearly cause substantial harm to the green setting of the World Heritage Site, the character of the open countryside at this point, and the setting of the Conservation Area.

The site off Eastfield Avenue is on a steep south-facing slope and also lies within the Conservation Area. The site is clearly viewed from the streets in the surrounding area and provides historic context and an attractive setting for not only the World Heritage Site/City but also the setting of Upper Weston Farm. The field also reinforces the present clear distinction between existing urban development and the attractive open nature of the countryside, which surrounds it. At present, in part, the field is used for the grazing of sheep.

The impact of development on the character and setting of a Conservation Area is a material planning consideration. The development of the fields north of Green Acre's, and off Eastfield Avenue, clearly do not preserve or enhance the character or setting of the Conservation Area. The development of such sites for housing will cause harm and appear

visually incongruous.

In respect of assessing the impact of the proposed development on heritage assets reference is once more made to the “... special regard ...” which needs to be given to development impacted on the setting of listed buildings under The Planning Listed Buildings and Conservation Areas Act 1990. This applies not only to buildings of outstanding merit such as Beckfords Tower but also the more humble examples of vernacular architecture reflected in traditional farmsteads such as at Heather Farm, which is referred to in the statutory list.

Consideration should also be given to the impact of development on undesignated assets, such as Upper Weston Farm, as identified in the National Planning Policy Framework and guidance provided by English Heritage.

Undeveloped green spaces/open fields contribute to the setting of historic farmsteads and to an understanding of their significance and character.

The development of the site to the south of Heather Farm will clearly have a substantial adverse impact on its setting, as would the site to the north of Green Acre’s which forms part of the farms wider setting. The cumulative adverse visual impact of both developments, because of their close proximity to the historic farm complex at Heather Farm, will be substantial.

The approach to the undesignated heritage asset, Upper Weston Farm, and the setting of Conservation Area in which it is located, will also be substantially harmed by the development of the field north of Green Acres.

Although all the sites are located some distance from Beckfords Tower it may still be argued that the fields, at least to the north of Green Acres and off Eastfield Avenue, form part of its wider countryside setting. Indeed, as noted previously, views of Beckfords Tower can be seen from the field proposed for development north of Green Acre’s and distant views can be obtained from the public rights of way to the north east, which pass along the edge of the Cotswold Plateau and provide dramatic views across the Weston valley slopes, back over the Green Acres site. Development of these sites would harm the wider setting of an important Grade 1 listed building

Due to the fact that all the sites are on rising valley slopes, in particular those either side of Lansdown Lane, they will also be more prominent when seen from distant views. For example from higher vantage points within the Cotswold Area of Outstanding Natural Beauty, including the Cotswolds Way, and those identified on the edge of the Cotswolds Plateau over looking Weston. Their development will therefore cause further harm when seen from these viewpoints and those already identified in the Bath World Heritage Site Setting Supplementary Planning Document.

#### HIGHWAY CONCERNS/OBJECTIONS.

Development of the sites for housing either side of the heavily trafficked, relatively narrow, and steep, Lansdown Lane are cause for highway concerns and further objection. The new vehicular access points will be in relatively close proximity not only to themselves but also the existing access, which serves the large housing estate, of Napier Road. The developments will therefore increase the probability of accidents on Lansdown Lane. The proposals would therefore be detrimental to highway safety.

In allocating sites for new housing the local authority should also be minded of the need to provide safe cycleway routes into and around the City. However, by their very nature these outlying sites are some distance from the existing cycleway network and it will provide difficult to provide safe facilities on this heavily trafficked route into the City.

Although a location is noted for a joint cycleway/footpath along an existing footpath from Green Acre’s to serve one of the sites this footpath is too narrow for a combined cycleway/pedestrian route. Once in Green Acres there also appears little room for a separate cycleway and therefore greater potential for cyclist and vehicle conflict.

Further concerns are also raised regarding potential overlooking of adjacent existing properties from the proposed cycleway /footpath, when entering Green Acres from north, because the field is on an elevated site when compared with the properties in Green Acres.

#### FLOOD RISK CONCERNS/ OBJECTIONS.

Weston is well known for its springs, which flow down from its valley slopes. The developments of all the sites, but in

particular that to the north of Green Acres which is on the highest slope, has the potential to increase the risk of flooding to existing properties on the lower slopes by disturbing underground springs and their present routes, and by additional drainage run off from the new housing development. Due to climate change the risk of flooding in general will not get better but will increase.

There is therefore the potential to increase the risk of flooding to existing housing in Weston and therefore residential development on such sites should be avoided.

#### 4.0 ALTERNATIVE SITES FOR DEVELOPMENT, AND OTHER SITES IN WESTON.

The Council should revisit increasing the density of housing on Brownfield sites, which have been already identified for development in Bath to avoid building on Greenfield sites. Brownfield redevelopment is also more sustainable. For example the Council should look at increasing housing densities on the planned development of the M.O.D sites in Bath, and providing increased housing provision at Innovation Quay North, on the site of the present Avon Street Car Park, Innovation Quarter at Manvers Street and the site of the Old Corn Market in Walcot Street. In the case of the City Centre sites the importance of additional employment/business sites are appreciated but a vibrant City, during the day and night, would also benefit from additional housing provision.

More weight should be given to the statutory designations and policy, which restricts the development on green field sites surrounding Bath because of its special sensitivity

The designated statutory constraints associated with Bath and its surrounding countryside, which also lies within the Cotswold Area of Outstanding Natural Beauty, should be given more weight when considering the suitability of sites for development in other areas of the District by the Council. For example it is noted that some areas in Keynsham and Whitchurch have been discarded because they would harm landscape or Green Belt, however, they do not appear to have the additional complex layers of statutory protection as at Bath, nor would the development of such sites impact on the setting of a World Heritage Site, and the sites do not have a Conservation Area of international interest as at Bath.

As noted in Section 12 of the National Planning Policy Framework when considering the impact of proposed development on the significance of a designated heritage asset great weight should be given to the assets conservation. The greater the importance of the asset, the greater the weight should be given.

The sites discarded at Keynsham and Whitchurch should be looked at again in view of the above. It may also be desirable to revisit any previous assessments made for additional housing in the villages within the District, and their immediate surroundings, but trying to avoid those of high heritage or high landscape value, such as those villages located in Conservation Areas, in close proximity to the World Heritage Site, or within an Area of Outstanding Natural Beauty.

In those cases where alternative appropriate sites are available for development, but landowners have not come forward with development proposals, they should be encouraged to do so by the Council.

Other sites in Weston

Notwithstanding objections in principle to the development of green field sites in Weston, as noted above, if the Inspector is still minded to remove Green Belt land from Weston there also appears alternative sites, previously proposed, which have been discarded but which have a number of advantages over the sites either side of Lansdowne Lane, in particular the higher field to the north of Green Acres. These may benefit from revisiting and substitution for the present allocated sites to minimise harm: -

Area F. At the north western end of Broadmoor Lane (As identified in Background to The Proposed Amendments to the BANES Core Strategy. November 2013. BNES 51)

It is understood that there are highway concerns over development of this site because access to it is via the same road, which serves the school, and that the site may also be expensive to develop because of a major gas pipe in the area.

It is suggested that traffic management measures should be explored in order to reduce highway concerns and that the cost of developing a site should not outweigh the harm caused by the development of the more visible sites on the higher valley slopes. For example, the sites either side of Lansdown Lane. A reduced site area, to that noted in the above report will also be required, to reduce the developments impact on the green setting of the World Heritage Site/Green Belt and

to minimise impact on the setting of Heather Farm. The site should go no further north than Napier Road.

Area A1. Site off Purlewent Drive (As identified in Background To The Proposed Amendments to the BANES Core Strategy. November 2013. BNES 51)

This site does not lie on the historic route into the City, via Lansdown Lane, and also lies on a lower valley slope. It may be argued the highest valley slope proposed for development, north of Green Acres, is more visible from views from the West over the valley from the Cotswold Way and from higher viewpoints to the north and north east back over Weston. The site also does not require direct access onto the more heavily trafficked Lansdown Lane, lies closer to the centre of Weston and its facilities, and also does not lie in such close proximity to historic farmsteads, which are an important characteristic of the area.

The site also appears to have a substantial existing tree/ hedge belt boundary which could be reinforced, if required, and furthermore from the site safe pedestrian access could then be linked into the designated Village Green to the south east, via a green buffer/space centred on the existing play area already provided at the rear of Purlewent Drive. Pedestrian links could also be provided into the adjacent public rights of way network in the area, which also lie in close proximity to the site.

A reduced area for housing in this location could be considered to minimise its impact.

#### CONCLUSION

An important characteristic of the beautiful City of Bath and the World Heritage Site is its green setting, the openness, character, appearance and natural beauty of the surrounding countryside, historic routes into the City, and viewpoints into and out of the City/World Heritage Site. The City of Bath World Heritage Site Setting Supplementary Planning Document, Adopted August 2013, also identifies the sites proposed for development as being located within the Green Hill Side setting of Bath and viewed from important viewing points from the surrounding area.

The historic landscape and features such as farmsteads and their surrounding fields also contributes to the character, appearance, and setting of not only the World Heritage Site but also the Conservation Area, the natural beauty of the Cotswold Area of Outstanding Natural Beauty and the openness, character of the Green Belt. Such features help reinforce the unique character of the area, its special sense of place.

Primary legislation requires that special regard, consideration, should be given to development impacting on the setting of listed buildings and emphasises the importance of preserving or enhancing the character of Conservation Areas.

National and Local Policy/Guidance reinforces the need for protecting and enhancing the above. The present complex layers of statutory designations in this area clearly recognises the high historic and natural landscape quality of the area, and great weight should be given to these considerations.

The need for further housing sites in the District is acknowledged but this must also be balanced against other statutory requirements/designations that try to protect, conserve, enhance the unique setting of Bath and the World Heritage Site.

In addition to assessing the harm caused by removing the sites from Green Belt, allowing development, and the consequent harm caused to the setting of the World Heritage Site, the harm caused to other material planning considerations, the natural beauty of the Cotswold Area of Outstanding Natural Beauty, character and setting of the Conservation Area, listed buildings and undesignated heritage needs to be assessed. Individual and cumulative levels of harm.

Proposals for development on the sites at Weston are clearly inappropriate. The need to provide additional housing, including affordable housing, clearly does not outweigh the harm which would be caused to the character, appearance and openness of the Green Belt, setting of the World Heritage Site, reduction in natural beauty of the Area of Outstanding Natural Beauty, the setting, character, appearance of the Conservation Area, setting of listed buildings, and undesignated heritage assets. The harm caused would be substantial.

Proposals for the sites are also vague and when detailed proposals are submitted they will only serve to emphasise the inappropriate nature of the development proposed. The Placemaking and Mitigation proposals, in the absence of detailed

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

proposals cannot be easily tested or relied on and should be given little weight. Placemaking and Mitigation proposals do not outweigh the harm caused.

If the Inspector disagrees and finds that less than substantial harm is caused it is still maintained that the level of harm, because of the special sensitivity of the area, still clearly outweighs the need for additional housing.

Housing need is only one of a number of material considerations. The proposals for housing do not justify the levels of permanent harm. A special case has not been made

The need for land supply for housing should not be allowed to overcome/outweigh Green Belt and the other material planning considerations protecting such sensitive sites from development,

In an area of such high sensitivity allowing development would clearly also risk setting an undesirable precedent. The proposals not only undermine National Green Belt policy, as development of such sites conflicts with the purpose of checking urban sprawl and safeguarding the countryside from encroachment, but also other legislation, policy and guidance which seeks to protect highly sensitive heritage assets such as World Heritage Sites, and also Areas of Outstanding Natural Beauty from inappropriate development.

The development will also be detrimental to highway safety, and lead to greater risks of flooding.

**Change to the policy requested:**

The Inspector is respectfully requested not to approve the removal of the areas in Weston from the Green Belt and allow development on the green field sites for the reasons given above .

**Respondent Number:** 5167 **Comment Number:** 1 **Respondent Name:** Mrs Lisa Pritchard

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

Support:

We object to the Weston Strategic Site Allocation proposal for the following four reasons:

- (1) Lack of local and comparative assessment in terms of impact on Green Belt;
- (2) Landscape and visual impact;
- (3) Impact on ecology; and
- (4) Impact on the existing Highway network.

1. Lack of assessment of impact on Green Belt

As set out in Para 1.4 of Planning Policy Guidance 2 (PPG2), and Para 79 of the National Planning Policy Framework (NPPF), the fundamental aim of Green Belt policy is to prevent urban sprawl; the most important attribute of Green Belts is their openness and permanence. The purposes of the Green Belt as set out in Para 1.5 of PPG2, and Para 80 of the NPPF, are:

1. To check unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns from merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

B&NES Green Belt review (Arup, April 2013) in our opinion fails to address the purposes 1 -4. And it is unclear from the proposal whether there are urban sites which may be available for development as an alternative to the identified sites.

In our opinion the sites proposed within the Weston Strategic Site Allocation are valuable with respect to at least three of the criteria (1, 3 and 4) and would therefore not be considered as suitable for removal from the Green Belt.

2. Landscape and visual impact assessment

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

The sites proposed for removal from the Green Belt at Weston are highly visible in the landscape and are located on a prominent hillside. These sites fall within the Bath World Heritage Site and the Cotswolds Area of Outstanding Natural Beauty (AONB), and are overlooked by the Grade I Listed Beckford's Tower.

A study undertaken by Arup, Landscape and Visual Study Lower Slopes at Weston April 2013 identifies the sites as having 'medium' sensitivity and development will have a permanent impact. It is unclear how the Weston site selection compares to other sites in the locality, with no clear scoring method.

### 3 Ecological concerns

Bats are European protected species, any potential impact on bats resulting from proposed development are a material consideration in the planning process. At this stage that the council cannot adequately determine if there would be an adverse impact on the local population of bats from the proposed development, as the level of survey that has been undertaken is not robust and not in line with current guidance and good practice.

### 4 Impact on the Highway

The proposed pedestrian access routes onto Lansdown Lane have a steep gradient and poor protection from heavy commuter traffic, acting as disincentives for non-vehicle transportation. The locations at present are unsustainable in terms of walking distance to and from local amenities and would therefore encourage further vehicle trips on the already congested Lansdown Lane.

Change to the policy requested:

**Respondent Number:** 5168 **Comment Number:** 1 **Respondent Name:** Mr Philip Browne

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

Support:

We object to the Weston Strategic Site Allocation proposal for the following four reasons:

- (1) Lack of local and comparative assessment in terms of impact on Green Belt;
- (2) Landscape and visual impact;
- (3) Impact on ecology; and
- (4) Impact on the existing Highway network.

#### 1.Lack of assessment of impact on Green Belt

As set out in Para 1.4 of Planning Policy Guidance 2 (PPG2), and Para 79 of the National Planning Policy Framework (NPPF), the fundamental aim of Green Belt policy is to prevent urban sprawl; the most important attribute of Green Belts is their openness and permanence. The purposes of the Green Belt as set out in Para 1.5 of PPG2, and Para 80 of the NPPF, are:

1. To check unrestricted sprawl of large built-up areas;
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5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

B&NES Green Belt review (Arup, April 2013) in our opinion fails to address the purposes 1 -4. And it is unclear from the proposal whether there are urban sites which may be available for development as an alternative to the identified sites.

In our opinion the sites proposed within the Weston Strategic Site Allocation are valuable with respect to at least three of the criteria (1, 3 and 4) and would therefore not be considered as suitable for removal from the Green Belt.

**2. Landscape and visual impact assessment**

The sites proposed for removal from the Green Belt at Weston are highly visible in the landscape and are located on a prominent hillside. These sites fall within the Bath World Heritage Site and the Cotswolds Area of Outstanding Natural Beauty (AONB), and are overlooked by the Grade I Listed Beckford's Tower.

A study undertaken by Arup, Landscape and Visual Study Lower Slopes at Weston April 2013 identifies the sites as having 'medium' sensitivity and development will have a permanent impact. It is unclear how the Weston site selection compares to other sites in the locality, with no clear scoring method.

**3 Ecological concerns**

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**4 Impact on the Highway**

The proposed pedestrian access routes onto Lansdown Lane have a steep gradient and poor protection from heavy commuter traffic, acting as disincentives for non-vehicle transportation. The locations at present are unsustainable in terms of walking distance to and from local amenities and would therefore encourage further vehicle trips on the already congested Lansdown Lane.

**Change to the policy requested:**

**Respondent Number:** 5174 **Comment Number:** 1 **Respondent Name:** Dr Rachel Jarai

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Housing development on the proposed site is inconsistent with Section 9 of the National Planning Policy Framework (NPPF), which serves to protect Green Belt land. The fundamental aim of national Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness and permanence. The identified sites in Weston satisfy important roles of Green Belt land, as set out in the NPPF, including: (i) checking urban sprawl, (ii) safeguarding countryside from encroachment, (iii) preserving the setting and special character of historic towns.

I am particularly concerned with how Section 9 of the NPPF makes an explicit link between urban regeneration and the restriction of housing development to only non-Green Belt sites: this national policy forces exhaustive use of urban land, which cannot be relaxed by turning to Green Belt sites. There is no evidence within the proposal to suggest that urban sites within B&NES have been exhausted, and as such, the Weston Strategic Site Allocation is not justified.

There are also problems with the proposal based on grounds of sustainability: building homes in the outer reaches of Upper Weston would promote car-dependency (the sites are remote from amenities, and offer poor pedestrian and cycling routes along Lansdown Lane, with its steep gradient and lack of protection from heavy commuter traffic). Housing development on these identified sites would build on protected hillside within an Area of Outstanding Natural Beauty, and would have a detrimental impact on the skyline and landscape of this World Heritage city.

**Change to the policy requested:**

The proposal for releasing land from the Green Belt in Weston should be abandoned, because it is not justified, is not

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

sustainable, and is not compliant with Section 9 of the NPPF.

**Respondent Number:** 6298 **Comment Number:** 1 **Respondent Name:** Mrs June Clements **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)**Location:** Land adjoining Weston (Eastfield Avenue)**Comment made on the Proposed Change:**Support: 

This should not be allowed to happen as

(a) It is the Green Belt and to remove it is inconsistent with the National Planning Policy Framework (NPPF) Section 9 which serves to protect the Green Belt.

(b) The development is directly opposite the Cotswold Way National Trail which is a very necessary element in the promotion of TOURISM to Bath. It is Internationally known and derives its popularity and status from the manner in which it presents the Cotswolds to the World. To allow further housing to climb the hillside will detract from this most excellent amenity.

(c) All services, particularly drainage from the above Napier Road site, will have to be taken through Weston High Street via Lansdown Lane. The installation of such drainage from both sites will cause massive disruption to Weston village.

(d) The further introduction of “hard” surfaces, i.e. roads, roofs and driveways/parking areas, on a hill above Weston will threaten Weston High Street and Manor Road with flooding. This has been experienced historically and, although work has been carried out to alleviate the current situation, to add further hard surfaces above Weston is a sure recipe for serious flooding. Weather in the United Kingdom has shown a marked tendency to more extremes of rain and this, if allowed to combine with your proposal, will surely guarantee floods in Weston. It is unlikely that you will be able to accommodate sufficient storm water drainage to cope.

(e) The arrangements for traffic entry to the local Primary School are hopelessly inadequate and dangerous. This is at present. It is only a matter of time before a serious accident happens in the area of All Saints School gates. Is it your intention to make it more certain? By allowing this development you surely will be part of the accident which must happen if more children are educated at this school. The dangers around this school entry have already been the subject of warnings.

(f) The Lansdown Lane, Lansdown Road, Freezing Hill route, an already busy route to and from the M4 is unsuitable for more traffic. (See what happens at the Tog Hill junction during busy periods- it is not uncommon to find traffic queued for half a mile or more to enter the A420) To allow this development would certainly create more traffic as there is little employment in the Bath Area.

(g) The Government and B&NES council are trying to encourage travel by bicycle. It is doubtful if many will want to cycle to and from land above Napier Road from Bath. Such a development would be completely unable to sustain cycle travel. The same can be said for encouraging pedestrian access – it will not work.

(h) The plans also have ecological consequences for European Protected Species - Bats

**Change to the policy requested:**

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**Respondent Number:** 6299 **Comment Number:** 1 **Respondent Name:** Sheila Holvey  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA25 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

**Support:**

1. There are many natural underground springs on Lansdown and inevitably the water ends up in our gardens. When it has been raining hard the water will actually force its way through our garden walls!

2. As to the extra entrances on to Lansdown Lane this beggars belief!! Already this lane (which has not been updated in the last 40/50 years since we have been living here) is a main route to and from the M4. The 20 mph limit has not made it any easier to cross the road - for instance last Tuesday at about 4.30 p.m. before being able to cross the road we had to wait for 42 cars to pass- eventually one kind driver slowed down and beckoned us across!

As for the 20 mph limit - this has not had the slightest impact! Lansdown LANE is now like a main road but is still only a rural village route,

3. Tesco is now building a bigger store in the village with flats above but has removed some of the original parking. If more houses plus cars are allowed it feels as if it will be the beginning of the end for the once lovely village.

This is an area of Outstanding Natural Beauty and as such the green belt area is very important especially in a Heritage City.

**Change to the policy requested:**

**Change Reference: CSA26 Land adjoining Weston (Eastfield Avenue)**

**Respondent Number:** 279 **Comment Number:** 4 **Respondent Name:** Rohan Torkildsen

**Respondent Organisation:** English Heritage

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA26 Land adjoining Weston (Eastfield Avenue)

**Location:** Land adjoining Weston (Lansdown Lane)

**Comment made on the Proposed Change:**

**Support:**

Change ref: CSA26 Strategic Allocation Weston (Lansdown Lane)

The Heritage Assets Study (CD9/LV/1) appears to highlight (coloured red) that development on the western portion of the site would cause substantial harm to the Outstanding Universal Value of the World Heritage Site contrary to the policies of the NPPF. There appears no justification or explanation for its inclusion.

The Heritage Assets Study (CD9/LV/1) appears to highlight that development on the middle portion of the site would harm (coloured amber) the Outstanding Universal Value of the World Heritage Site. Again there is no “clear and convincing justification” or explanation of the “public benefits” that would derive to justify the harm.

This allocation does not appear to accord with the provisions of the NPPF and the soundness of the Core Strategy is affected as a consequence. There may however be an opportunity for you to clarify and address the above to overcome the concerns.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:****Respondent Number:** 4862 **Comment Number:** 1 **Respondent Name:** Mr Paul Robinson **Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA26 Land adjoining Weston (Eastfield Avenue)**Location:****Comment made on the Proposed Change:**Support: 

My comments concern the rejected area a the end of broadmoor lane around and adjacent to Bungalow Farm /Napier road.This area first considered favourable with low visual impact and good vehicle/pedestrian access (pavement finishes at the field entrance and a public footpath runs the full length to the cow sheds) but has since been rejected because of the restrictions around the gas pipeline.

I feel this area should be taken out of the greenbelt and considered for future development for the following reasons -

With the 35m buffer zone restriction there is still 3ac of low visual land available for development with a 70m green strip to the back of houses at napier road.

The future of the northsea gas pipeline is uncertain ,the 35 year land lease agreement was started in 1970 and could have expired in 2005 ,we are seeking advise on the future of the pipeline or if it is still in service.

The farm buildings adjacent to the bungalow are mainly run down and and considered unfit for purpose as a farm and an eyesore from the near houses,development of the area could greatly improve the views from nearby houses and provide the farm with funds to provide more suitable buildings for livestock in a more suitable location.

The inclusion of this land could form a footpath/cycle link with broadmoor lane.

**Change to the policy requested:**

To ensure some of the benefit gained by moving the greenbelt can be returned to local working farms to enable them to invest in their farms and protect the remaining greenbelt land for the future generations.

Greenbelt land and footpaths need working farms to maintain the land ,the future of working farm should be taking into consideration when the greenbelt is realigned.

**Respondent Number:** 5004 **Comment Number:** 1 **Respondent Name:** Mr Graham Stevenson **Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA26 Land adjoining Weston (Eastfield Avenue)**Location:****Comment made on the Proposed Change:**Support: 

The proposed allocation of land for development to the east and west of Lansdown Lane north of Weston village is unsuitable for the following reasons:-

- The topography of the area will be a deterrent to many of the residents to walk or cycle and therefore the majority will be reliant on private transport
- It is too far from the amenities of the village of Weston, and the steep gradient of the area will make it less likely that people will walk to the local shops and schools

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- There will therefore be an increase in the volume of traffic along Lansdown Lane with access points at a part of the road where there is already a steep gradient
- The speed of traffic along Lansdown Lane has not reduced in spite of the recently imposed 20mph limit and it is not enforced; this route is traditionally used for access to and from the M4 from the West of Bath
- During the winter months the higher altitude of this part of Weston makes it more prone to snow, ice and fog making driving conditions more hazardous
- Recent winters have seen public transport limited to the reach of Eastfield Avenue with roads north e.g. Leighton Road and Napier Road not accessible due to snow and ice
- The residents of these roads particularly Napier had to dig themselves out to reach Lansdown Lane after 3 days when the roads were not suitable for vehicular traffic after heavy snow
- Development on the upper slopes will have a high impact on the landscape character of the northern extent of the city's urban area
- The geology of the upper slopes needs to be investigated extensively due to the surface land drainage problems and numerous springs that are found in this area
- During heavy rain there is considerable run off from the adjoining fields onto Lansdown Lane which will only become more problematic with increased development
- There needs to be improved drainage to ensure that the lower slopes and houses in Weston are not liable to flooding because of inadequate drainage from the higher slopes
- The Primary School does not have capacity to accept a large increase in pupils; the existing voluntary one way system along Broadmoor Lane and Leighton Road for parents to drop off their children is already congested and hazardous for pedestrians due to the lack of pavement along part of Broadmoor Lane. This will only become worse with the resultant increase in traffic putting pupils lives at risk
- Development will have an adverse effect on the natural environment and the biodiversity of the area. It is notable for its birdlife including jays, green woodpeckers, great spotted woodpeckers, buzzards and hawks. There will also be a loss of habitat to the numerous smaller mammals and insects which are found in this area.

**Change to the policy requested:**

**Respondent Number:** 5033 **Comment Number:** 1 **Respondent Name:** Mr & Mrs Adams **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA26 Land adjoining Weston (Eastfield Avenue)**Location:****Comment made on the Proposed Change:**Support: 

We object strongly to the proposal to remove land to the West of Lansdown Lane from Green Belt for Housing development. The proposed strategic site allocation to the west of Lansdown Lane has a number of environmental and landscape constraints as follows:

- Bath World Heritage Site and World Heritage Site Green Hills Setting
- Conservation Area Setting
- Cotswold Area of Outstanding Natural Beauty
- Existing natural springs. Many undocumented
- Within zone of influence of SNCI and BAP
- Area with potential archaeological assets
- Increased traffic flow onto Lansdown Lane
- Potential harm to existing wildlife habitat, including badgers, foxes, bats and many species of wild birds

We fully support the representation submitted by Mr & Mrs Perry at 57 Napier Road, Bath.

**Change to the policy requested:**

Required changes.

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- Amend CSA14(Policy DW1) to reduce housing numbers by circa 50( or the amount of housing intended to be developed on land to the west of Lansdown LaneWeston)
- Amend CSA18(PolicyB1(3) to reduce housing numbers planned for land adjoining Weston by circa50(or the amount of housing intended to be developed on land to the west of Lansdown Lane)
- Amend CSA6(Table1c) to reduce the number of houses provided in Bath by circa 50(or the amount of housing intended to be developed on land to the west of Lansdown Lane,Weston)
- Amend CSA25(Policy 3B) to remove reference to the land to the west of Lansdown Lane and delete the Placemaking Principles relating the the land to the west of Lansdown Lane.
- Delete CSA26
- Amend CSA 28 to delete the boundary of the site allocation and proposed Green Belt boundary amendments of land to the west of Lansdown Lane,Weston
- Delete any other references to land to the west of Lansdown Lane from the Core Strategy and reduce housing figures accordingly.

**Respondent Number:** 5139 **Comment Number:** 2 **Respondent Name:** Mr & Mrs D. Perry

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA26 Land adjoining Weston (Eastfield Avenue)

**Location:** Land adjoining Weston (Eastfield Avenue)

**Comment made on the Proposed Change:**

**Support:**

N/A

**Change to the policy requested:**

Delete the strategic site allocation and associated green belt boundary amendments on land to the west of Lansdown Lane from CSA26 (Concept Diagram).

**Respondent Number:** 5173 **Comment Number:** 1 **Respondent Name:** Mr Perry

**Respondent Organisation:**

**Agent ID:** 34 **Agent Name:** GL Hearn

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA26 Land adjoining Weston (Eastfield Avenue)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The proposed allocation (BNES CSA 26) is supported in principle, and is considered to be a deliverable site within 5 years. The objective sustainability assessment process undertaken by the Council to inform the proposed allocation is considered to be sound. However, it has been necessary to object to the allocation, and to propose an amendment to enhance flexibility, in order to maximise the prospects for delivery of the site. The background to the proposed amendment is summarised briefly below:

The proposed allocation spans two land holding interests. The larger western part of the proposed allocation is owned by Mr R Perry (the principal landowner) and extends to 4.5ha. Refer to the attached Proposed Site Allocation Plan, GLH Drg Ref No. 1212J016755D1.

The remaining land interest of the proposed allocation is controlled by Mr Perry's sister, Mrs J Comley. This comprises two elements: Heather Grange and its associated paddock, which lies immediately to the west of Lansdown Lane extending to 0.43ha; and land which lies immediately to the east of Lansdown Lane extending to 1.6ha. Refer to the attached Proposed Site Allocation Plan, GLH Drg Ref No. 1212J016755D1.

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The principal landowner, Mr R Perry, is in advanced discussions with a home builder developer. At the time of writing terms have been agreed but we are at this time unable to disclose the identity of the home builder partner who has been selected by the principal landowner to deliver the proposed allocation.

In addition, the home builder development partner will seek to negotiate terms to deliver a comprehensive solution for the land to the west of Lansdown Lane with regard to a suitable access point. However, in order to maintain flexibility in respect of a suitable access point it will be necessary to consider alternative access options to enable the land controlled by Mr R Perry to be developed on a standalone basis.

While the preferred option will be to form a new vehicular access across Mrs Comley's land, the alternative access options that are available include the following:

Alternative Access Option 1: via Napier Road. This option has been assessed by the Council (BNES Ref:CD10/E8) and the landowner's team. It would be necessary to form a new vehicular access through Napier Road. This would be a deliverable solution in highway terms.

Alternative Access Option 2: to provide a new vehicular access from Lansdown Lane via Heather Farm. This option may require the rationalisation and/or re-planning of the existing storage business on site, and could also create additional housing capacity and/or a mixed-use scheme. Under this option it may be possible for the home builder to seek to negotiate an additional pedestrian/cycle link through Mrs Comley's paddock to maximise permeability. However, the principal landowner, Mr R Perry owns land on both sides of Lansdown Lane, which will allow for greater flexibility in terms of access.

In order to deliver the allocation, under alternative Access Option 2, the proposed amendment is to seek to take out Heather Farm from the Green Belt. The area of additional land proposed for release from the Green Belt is annotated on the attached Proposed Site Allocation Plan, GLH Drg Ref No. 1212J016755D1.

When the prospective home builder has signed an option a multidisciplinary consultant team will be assembled. A site specific evidence base will be developed and shared with the Council.

It is proposed that a Statement of Common Ground will be agreed with the Council and submitted to the Inspector during February 2014. The landowner and prospective delivery partner will also prepare a Position Statement in advance of the Examination Hearings, which will set out further details and will also include a capacity assessment.

### Change to the policy requested:

The proposed change seeks to include an adjacent area of 1.5h at Heather Farm in the allocation, which will require a change to the boundary annotated on the 'Concept Diagram' (Change Ref CSA26). The additional area for inclusion is annotated on the attached Proposed Site Allocation Plan, GLH Drg Ref No. 1212J016755D1.

## Change Reference: CSA27 Land adjoining Weston (Lansdown Lane)

**Respondent Number:** 279 **Comment Number:** 5 **Respondent Name:** Rohan Torkildsen

**Respondent Organisation:** English Heritage

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA27 Land adjoining Weston (Lansdown Lane)

**Location:** Land adjoining Weston (Eastfield Avenue)

### Comment made on the Proposed Change:

Support:

Change ref: CSA27 Strategic Allocation Weston (Eastfield Avenue)

The Heritage Assets Study (CD9/LV/1) appears to highlight that development on the middle portion of the site would harm (coloured amber) the Outstanding Universal Value of the World Heritage Site, the Bath Conservation Area and potentially significant non-designated archaeology (Lynchets). Again contrary to the NPPF there appears no "clear and convincing

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justification” or explanation of the “public benefits” that would derive to justify the harm or show whether the significance of these heritage assets can be conserved through appropriate design or mitigation.

The Heritage Assets Study describes the eastern portion of the site as causing substantial harm to the Outstanding Universal Value of the World Heritage Site. Again there appears no justification or explanation for its inclusion or whether the significance of these heritage assets might be conserved through appropriate design or mitigation.

This allocation appears not to accord with the provisions of the NPPF and the soundness of the Core Strategy is affected as a consequence. Again, perhaps, the above might be explained, clarified and addressed to satisfy the concerns.

**Change to the policy requested:**

**Respondent Number:** 5010 **Comment Number:** 1 **Respondent Name:** Steve Goss

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA27 Land adjoining Weston (Lansdown Lane)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Justified: I do not believe the changes set out in the supplied documentation to be justified. When considering the social objective of sustainability this surely cannot be met when considering the impact this change will have to the existing schooling and NHS provision for Weston and Bath. Weston is already struggling to meet its primary school intake year on year (175% over subscribed in last OFSTED report in Weston) and the local hospital, based in Weston, is already over capacity. No mention is made as to how the impact of adding more houses to the area is going to be mitigated in these important areas. WASPS school has already been extended once and will soon be unable to extend viably any further. Explain how these issues are being addressed without using the words “more funding will be found”. Also how can building on the greenbelt be considered environmental? Surely the process should also publish all brownfield sites that have or have not been considered for these extra houses before a decision is made to build on greenbelt.

National Policy: Whilst more housing is a national policy, it in this case runs counter to the national policy “Reducing the threats of flooding and coastal change” (DEFRA). The green belt area behind Eastfield Avenue is on a severe incline and so funnels water down to the streets that back onto it. There have already been several instances of flooding down the Weal after heavy rainfall as the existing greenbelt land could not absorb all the water. If any type of development is carried out on this greenbelt area it would lead to more flooding and therefore run counter to this specified national policy set out by the government to manage the risk of flooding.

It also goes against the “Improving the quality and range of education and childcare from birth to 5 years” (DfE) policy. With an influx of new families access to childcare will become more difficult with more children chasing the same places.

It also goes against the “Giving all children a healthy start in life” (DH) policy. This states that they are going to give a named midwife to every woman. With an increase in housing this will require more midwives and henceforth more funding to pay for these posts even assuming they could be found. It will place an strain on the NHS should these posts not be found and so far I have not read any details about extra NHS funding to cover this.

It also goes against the “Protecting and improving people’s enjoyment of the countryside” (DEFRA) policy. Even though new footpaths are being added these would not be necessary if they weren’t destroying a large part of the countryside to start with. Access will be made more difficult due to the increase of cars in the area. Access and use of the Cotswold Way path would be impacted and no matter how much you want to deny it, it has to have an impact on the landscapes considered core to the protection of Bath’s World Heritage site status due to the fact that the land is up on a hill visible from most parts of northern Bath.

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It also goes against the "Protecting biodiversity and ecosystems at home and abroad" (DEFRA) policy. Building on greenbelt land does not comply with the policy to enforce the laws and agreements that protect areas of land, and making sure these are properly managed. How does changing the rules for greenbelt comply with this policy?

I also have general points to make about transportation in the area. Already there are big issues on Eastfield Avenue and the Weal as to getting 2 cars side by side down the road at any one time. Adding more houses to the area will only exacerbate the issue and will probably require Eastfield Avenue to become 1-way or have no parking allowed. This is a bigger problem for the no.14 bus which when stopping currently blocks the entire road in both directions on Eastfield Avenue and also means that cars have to reverse dangerously in areas where children are playing and crossing. This scheme will force more cars onto Eastfield Avenue causing more congestion and may lead to the road becoming unusable as it would be blocked in many areas.

**Change to the policy requested:**

I am requesting that the plan to change the designation of the land identified to greenbelt is rejected due to the reasons outlined in 7.

**Respondent Number:** 5031 **Comment Number:** 1 **Respondent Name:** Mr Ben Wyon

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA27 Land adjoining Weston (Lansdown Lane)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Eastfield Avenue cannot cope with the existing traffic at peak times. There is not enough room for two vehicles to pass and waiting times are long when the buses come.

Any increase in traffic from a housing development off Eastfield Avenue would exacerbate the problem many times over.

Weston Farm Lane is a minor road with no pavement and no room to pass. Access to a housing development via this lane would cause huge traffic problems which would spill over into Mortimer Close and The Weal.

**Change to the policy requested:**

**Respondent Number:** 5056 **Comment Number:** 1 **Respondent Name:** Tim Hill

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA27 Land adjoining Weston (Lansdown Lane)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

First and foremost, I oppose any plans to eat further into precious greenbelt land especially when there are so many abandoned ex industrial properties around Bath that should be developed on first. Also with three now vacant ex MOD sites this should provide plenty of space to enable Bath to meet its quota?

My main question is regarding the plans to build on Weston (Eastfield Avenue) Change ref CSA27. where is the vehicle access road for the lower brown site in the diagram? The main access (red arrow) is shown as coming from Lansdown Lane but I cannot see how this road will feed round to the lower properties. There are pedestrian and cycle link (purple

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arrows) shown accessing from Eastfield Avenue and Weston Farm Lane. I would strongly object to any main vehicular access being provided from Weston Farm Lane. I live just off this road. The lane is very small and would not be able to cope with the additional traffic that would come through here if this became an access route.

Although it is not included in the plans for development I would also like to seek assurance and confirmation that land on the corner of Weston farm lane and opposite The Weal will not be brought into the plans for development and that all other Green Belt sites along Weston Lower Slopes will be protected forever.

**Change to the policy requested:**

Exhaust all brown belt sites first and redevelop Bath riverside to its full potential before eating further into Green Belt sites.

**Change Reference: CSA28 Land adjoining Weston (General)**

**Respondent Number:** 102 **Comment Number:** 2 **Respondent Name:**

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

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA28 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

**Support:**

FoBRA attended the drop-in event on green belt land needed for housing. It concluded that, if the Council is to get its Core Strategy approved (and this is most important or else it will be open to "hijacking" as is happening at Saltford), it seems inevitable that some extension into the green belt must be offered. The sites that have been identified appear to be relatively small and to have been arrived at through a sensitive and fair process. The proposals for Weston are regrettable, but there is much building there already and care has been taken to reject sites which are too visible from important views. This additional building might even be beneficial to the community of Weston Village, and commercially (and might help to avoid encroachment on South Stoke). However, the area enclosed by the proposed new Green Belt Boundaries is sufficient for more than double the number of houses at the density of adjacent development. Why is it necessary to take so much from the Green Belt now? FoBRA feels that, if more housing land is needed there in future, a second application should be made, providing the public with the opportunity to express their views at the right time.

**Change to the policy requested:**

Reduction in the area of Green Belt to be taken now, or explanation for the large area sought.

**Respondent Number:** 4611 **Comment Number:** 1 **Respondent Name:** Mr & Mrs Sparrow

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA28 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

**Support:**

The removal of land north of Weston Farm Lane from the Green Belt and allocation for residential development is supported. However, for reasons set out in representations to the previous consultation (May 2013) the allocation should be extended eastwards to including the adjoining land between the current allocation and Weston Farm, as outlined on the attached Plan.

The allocation should also include land adjacent to Blind Lane, as identified on the attached Plan. This land occupies the

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lowest slopes and already has the closest relationship with the existing urban area than any other land that it is currently proposed to allocate at Weston. Its exclusion from the allocation is therefore inexplicable.

At the very least, the land should be identified as 'safeguarded land' and removed from the Green Belt to accommodate future development requirements. Moreover, land north of Blind Lane could be brought forward separately as a non-strategic site subject to its removal from the Green Belt.

There is very little safeguarded land identified in the Core Strategy, and none on the edge of Bath. Every opportunity should be taken to accommodate development that is well located in relation to the most sustainable settlement in the district.

**Change to the policy requested:**

Extension of the allocation north of Weston Farm Lane to include:

- Additional land to the east between the eastern limit of the current allocation and Weston Farm.
- Additional land to the north of Blind Lane.

In the alternative:

- Removal of the land from the Green Belt and identification as 'safeguarded land' to accommodate longer term requirements and/or in the case of land north of Blind Lane, to enable the land to be brought forward as a non-strategic site.

**Respondent Number:** 5139 **Comment Number:** 1 **Respondent Name:** Mr & Mrs D. Perry

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA28 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

**Support:**

**Change to the policy requested:**

Amend CSA28 to delete the boundary of the site allocation and proposed Green Belt boundary amendments of land to the west of Lansdown Lane, Weston.

**Respondent Number:** 5157 **Comment Number:** 1 **Respondent Name:** Mr Matthew Davies

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA28 Land adjoining Weston (General)

**Location:** Land adjoining Weston (General)

**Comment made on the Proposed Change:**

**Support:**

I do not approve to the changes to the Green Belt and object to any development on these sites prior to the use of brown sites.

**Change to the policy requested:**

**Change Reference: CSA31**

**Respondent Number:** 275    **Comment Number:** 9    **Respondent Name:** Redrow Homes South West    **Respondent Organisation:**

**Agent ID:** 164    **Agent Name:** DLP Planning Consultants

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA31

**Location:**

**Comment made on the Proposed Change:**

Support:

Land west of Keynsham at Lays Farm is not included

The extent of the 'alternative option' identified on the plan at Annex 3 at Lays Farm, and identified with a potential capacity of 50 dwellings is based on wholly erroneous information as to the nature and position of a gas main shown on the (unnumbered) plan attached to the SHLAA and referred to by Arup in its review of Green Belt. This does not accord with the records held by Wales and West Utilities Ltd who own and operate the pipeline. The actual route of the pipeline runs some 100 metres further to the west (Ref: W&WU Pipeline Plan and letter from W&WU dated 12.06.2013 and attached at Appendix A to the Landscape and Visual Appraisal).

The impact of the existing pipeline on the development potential of the site is consequently minimal and certainly not such that would warrant disregarding it completely as a sustainable option. Moreover, it is feasible to divert the main, and Redrow have recently done just that elsewhere in Bristol, and by using modern materials it would further reduce any no-build easement to 6m.

This inaccurate information appears to have been the principal reason for Arup dismissing the land at Lays Farm as a serious option for release from the Green Belt, without properly assessing the scope for development here having regard to the purposes of Green Belt and in particular: preventing neighbouring towns merging into one another (i.e. Keynsham and Bristol); and preserving the setting and special character of historic towns (in this case, the Queen Charlton Conservation Area).

The site, south of Lays Farm (Ref: Area 10 BANES Sustainability Appraisal Report Annex L) is bound on two side by development and forms a far more logical addition to the built-up area of Keynsham than that proposed to be released from the Green Belt to the south (Ref: Area 13 BANES Sustainability Appraisal Report Annex L).

The Site is located adjacent to Charlton Road as it enters Keynsham from the south. It occupies an area of approximately 7.8 ha and is currently given over to pasture. Its northern and eastern boundaries are formed by built form, with its southern and western boundaries being rural in nature.

There is currently no public access onto the Site, although a well-used footpath runs along its southern boundary. There are no significant landscape features on the Site, other than the hedgerows which form the field boundaries.

The Site sits at an elevation of 72.5m AOD to 59.5m AOD, and is broadly flat in nature, sloping slightly downwards to its eastern boundary with Charlton Road.

The Site's landscape and visual relationship with its surroundings is primarily with the landscape of the Charlton Valley and Stockwood to the west.

The Site sits within the LCA5 'Dundry Plateau' of the Rural Landscape of Bath and North East Somerset, a rural Landscape Character Assessment and has an 'open' character, typical of this area.

The visual appraisal (attached) showed that the Site is partially visible from several locations to the west, but generally within the context of existing built form.

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BANES has, through its consultants, Arups, reviewed the Green Belt gap between Keynsham and Stockwood and identified and noted the easternmost field on the Lays Farm Site as potentially suitable for development. This area is outlined as part of Alternative Option KM3 in Annex 3 of the Schedule of Core Strategy Amendments - November 2013.

Arups' West Keynsham Development Concept Options Report (March 2013), should be reviewed, as it placed an existing high pressure gas main inaccurately on the Lays Farm Site, and also incorrectly presumed an overly wide easement zone associated with it. The incorrect location of this main heavily influenced Arups' 'Developable Area' which has fed through into the Schedule of Core Strategy Amendments.

In light of these inaccuracies the Site was revisited and the reappraised with particular consideration being given to: (1) Potential visual impact across the Charlton Valley; and (2) The setting of Queen Charlton (Conservation Area).

The landscape development strategy for the Site (see attached) has evolved out of the findings of the landscape and visual appraisal and the now correctly located, high pressure gas main. The proposal is to introduce development into the north-eastern part of the Site, set back from the western boundary and to introduce a significant strip of structure planting that is complementary to that which is found in the locality.

The introduction of a robust, defensible edge would ensure that in the long term the setting of Queen Charlton and the character of the Charlton Valley are not adversely affected by the introduction of development. Similarly the 'rounding off' of development in this south-eastern corner of the town, and the inclusion of the woodland strip would ensure that the separate identities of Keynsham and Queen Charlton are preserved as well as ensuring that there would not be a future coalescence with Stockwood to the west.

As such we do not believe development on the Site would compromise the purposes of the Green Belt (Ref: NPPF Para 80) with particular reference to preventing Keynsham merging with Bristol and preserving the historic setting and special character of Queen Charlton.

As a consequence of the above, the Site should be considered for inclusion within the land to be removed from the Green Belt and allocated for up to 150 dwellings.

### Change to the policy requested:

Amend notation on Diagram 12 to indicate release of land at Lays Farm, west of Keynsham.

## Change Reference: CSA32

**Respondent Number:** 180

**Comment Number:** 8

**Respondent Name:**

**Respondent Organisation:** J S Bloor Ltd

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA32

**Location:**

### Comment made on the Proposed Change:

Support:

Whilst the allocation of land at south West Keynsham and the redrawing of the Green Belt boundary is supported in Policy KE4, an objection is made to the fact that further land at south west Keynsham has been dismissed and is not safeguarded for future development, yet land to the east of Keynsham in Policy KE3B safeguards land at the East of Keynsham for development beyond the end of the plan period. It is not clear from the evidence base as to what the justification is, particular when reading BNES 51 "Background to the Proposed Amendments to the B&NES Core Strategy November 2013" para 3.45 which referred to BANES 47 para 5.18 where the Council explained why no safeguarded land was identified at Keynsham.

"In BNES 47 para 5.18, the Council explained why no safeguarded land was identified at Keynsham as follows;

5.18 At Keynsham, the capacity of the two urban extensions is a result of infrastructure constraints and the Green Belt. East Keynsham is the most sustainable location for an urban extension in terms of transport and access to facilities. However, the impact on the A4, the existence of a major gas line and the difficulties in accessing land north of the railway line constrain the level of development. In terms of Green Belt, the Keynsham - Saltford gap is a highly sensitive part of the Bristol Bath Green Belt (see Stage 1 Green Belt Review, CD9/E2). Based on this analysis, the Council cannot justify a greater level of development. If it could then it should allocate this now due to the sustainable advantages of this location. As with Bath, it would be inappropriate to safeguard land in a sustainable location if it is available now to meet development needs. Moreover, there is insufficient evidence to demonstrate that the issues that are constraining the capacity of this location could be adequately overcome and hence it would be unsound to safeguard land for the long term. " my emphasis in bold text.

Para 3.46 states "As stated in para 3.5 above, the issue of safeguarded land in the Core Strategy has been reviewed. The assessment of land parcels indicates the existence of additional, available and suitable land for development east and south of the allocated site. The Council maintains that it is premature to bring this land forward for development now for the same reasons that development is constrained to about 250 dwellings in this location. Whilst the Green Belt arguments are not so significant, the transport capacity limits the acceptable amount of development. There is no convincing evidence that these constraints can be overcome during the plan period." My emphasis in bold text.

Para 3.47 states: "Therefore, it is proposed that safeguarded land is identified at east Keynsham as shown in the Schedule of amendments (CSA35) in order to meet longer-term development needs beyond the plan period. This will ensure that the Green Belt boundary here will endure beyond the plan period, and will not need to be altered at the end of the plan period. Even then, the development of this land will be subject to demonstration that transport constraints can be properly addressed (as per NPPF paragraph 32)." My emphasis.

3.48 "This is considered to be the most appropriate location for safeguarded land east of Keynsham; development of C1 causes less harm to the Green Belt than land north of the railway (harm to purpose 3, limited harm to purpose 2 and the local 6th purpose) and has many of the benefits of the allocated site in terms of its location adjacent to the A4."

The justification for safeguarding land east of Keynsham is inadequate and contradicts all previous statements. There is no evidence to support the safeguarding of land east of Keynsham over any other area. East of Keynsham i.e. – the Keynsham Saltford gap was previously acknowledged to be a highly sensitive part of the Green Belt ( Stage 1 of the Green Belt review) as referred to in para 5.18 of BNES 47 and para 3.45 of BNES 51 and based on this analysis the Council could not justify a greater level of development. The evidence base as I have referred to above also states that there is insufficient evidence to demonstrate that the issues that are constraining the capacity of this location could be adequately overcome and hence it would be unsound to safeguard land for the long term. The most recent evidence base BNES 51 confirms that this is still the case as in para 3.46 it states that the transport capacity limits the acceptable amount of development and there is no convincing evidence that these constraints can be overcome. The transport constraints have not been properly addressed, therefore it is not clear why east of Keynsham should be safeguarded.

The Sustainability Appraisal Addendum Report does not provide any analysis of safeguarding land in any location. Although it does acknowledge in paragraph 4.2 in the context of Policy DW1 that: "Safeguarded land for future development would have major positive effects on meeting social and economic objectives in that it gives a degree of certainty about continuity of housing provision."

It is noted that the Site Appraisals, (Annex O) have helped to identify more specifically the areas with good potential to link to existing communities to promote vibrant and cohesive communities. They also help to avoid the areas without physical links or good potential to be linked by public transport or areas with disproportionality high infrastructure costs. However, this has not translated into any land being safeguarded apart from at East Keynsham and even this area the justification appears to be weak as it is reliant on necessary transport improvements in the A4 corridor - only when these have been secured will development be permitted.

Annex O the Green Belt Site Allocations Sustainability Appraisal is an addendum to the SA Report Annex L. However, it does not consider the issue of safeguarded land in the Green Belt. Consequently the schedule of amendments fails to address the strategic matter of safeguarded land.

The Council only identify land at East Keynsham to be safeguarded. The Council have indicated in some areas that the

safeguarding issue will be addressed in a review of the Core Strategy, however there is no certainty over the timing of this review i.e. when it will be undertaken, particularly as the Council indicate that the first review will be timed to enable co-ordination with the review of the core strategies of adjoining authorities in the West of England. Whilst the Duty to Co-operate appears as a standing item on the West of England Planning Housing and Communities Board agenda, there is no commitment to any timetable for the review of Core Strategies and much will depend on the outcomes of the Joint SHMA which has been commissioned, but it is not expected to report until autumn 2014, and even then these will only be draft findings.

In respect of East Keynsham which seems to be the only area identified where land can be safeguarded, it is noted in Annex O that Area A is accessible to employment opportunities it is relatively remote from the town centre of Keynsham and to the north of the railway line and also the A4 and therefore without easy access to the existing community facilities and locate services by means of transport other than the private car, and has limited connections to neighbouring residential areas. The appraisal indicates that there are potential benefits of a vehicular linkage between the A4 and A4175 from the north of the railway line and there is potential for longer term transport improvements but the deliverability of these improvements is uncertain also the funding.

The area of land that is proposed to be safeguarded is to the south of the railway line and the A4, but it is considered that this would lead to coalescence issues with Saltford (Area C1), could also increase propensity for commuting given proximity to AR corridor and therefore Bath and Bristol. There is no capacity to expand the primary school and consequently a new primary school would be required, but this is still assessed as a positive. There is no justification for safeguarding this area is provided in Annex O.

The Inspector indicates in ID 36 para 18 that given that the Council is proposing much less development than explored in the Arup Concept Options Reports there seems potential scope for major subsequent debate about what areas the policies apply to and how broad the areas of search should be.

The safeguarding of land from the Green Belt should be addressed in the Core Strategy for BANES; this was previously referred to in the Proposed Changes March 2013 and delegated to the Place-making Plan. In the Proposed Changes each of the policies on the broad locations recognised that there would be a need to identify safeguard land to meet longer term development needs. However, this is now dismissed until a review of the Core Strategy. This approach is not consistent with the NPPF para 85 or indeed the Inspector's advice in ID 36.

The Inspector continues to raise concerns about safeguarded land in ID 40 para 24 – 25. The Council acknowledges in BNES 51 para 3.5 "that its proposed approach could be dependent on an external trigger for additional housing land such as the need to accommodate needs from Bristol. Such a requirement may not be forthcoming leaving the issue of safeguarded land in BANES unaddressed. It has therefore given the matter further consideration in the BANES context as part of the assessment of the allocation of sites below."

It is considered that the proposed changes fail to address the issues in the NPPF para 83 ie when a Local Plan is reviewed it is at that time that the Green Belt boundaries need to be re-considered having "regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."

Para 85 of the NPPF provides advice on defining boundaries, local planning authorities should:...

- "where necessary identify in their plans areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."

The Inspector's note ID 36 "Concerns in relation to evidence on the Strategic Locations and questions on Green Belt Matters schedule of Proposed Amendments"

In para 16 the Inspector emphasises that when Green Belt boundaries are reviewed they should endure beyond the plan period and that he could not see the evidence basis for the Council concluding that there is no scope to identify

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safeguarded land. (The Proposed Changes March 2013 para 6.64A stated that the issue of safeguarded land will be considered in the Place Making Plan – this is included in the Policies on SW Keynsham and also Whitchurch. The Inspector commented that the plan needed to provide a strategic steer, and that the issue of safeguarded land is a strategic matter which the Core Strategy should be addressing so that the Place-making Plan has a clear outcome to delivery.

The Council have changed their position from the Core Strategy Proposed Changes (March 2013) where it is clearly stated in Policy KE4 that “The need to identify safeguarded land to meet longer term development needs will be considered by the Placemaking Plan.” Clearly at this stage it was acknowledged that safeguarding land at South West Keynsham would be considered.

At the time of the last Local Plan inquiry the Inspector concluded that the only direction in which Keynsham could accommodate further development was to the south. Development to the east, west or north west of Keynsham would contribute to coalescence of settlements, whereas development to the south would not undermine the separate identify of the town. “The Green Belt separation of Keynsham and settlements to the south is more extensive than for other areas of Keynsham so development of K2 would not undermine the separate identify of the town”, Inspector’s Report 2006 ref para 5.121 – 5.122.

There is no justification for why land east of Keynsham should be safeguarded as opposed to land at south west Keynsham.

**Change to the policy requested:**

The paragraph should be amended to reflect that there is scope for safeguarded land to the south of the site at South West Keynsham identified in Policy KE4.

Safeguarded land should be identified at South West Keynsham in accordance with the NPPF para 85 of the NPPF. Supplementary evidence to support the representations provides a landscape critique and a transport assessment of the potential for development beyond the site identified at South West Keynsham.

**Respondent Number:** 184 **Comment Number:** 4 **Respondent Name:** Paul Davis

**Respondent Organisation:** Persimmon Homes Severn Valley

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA32

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**

**Support:**

Persimmon Homes Severn Valley object to the sentence ‘At south west Keynsham it is not considered there is any scope to identify safeguarded land’. The Council’s evidence base does not justify this position and for the reasons set out in PHSV’s objections to CSA 37 additional land to the proposed allocation at South West Keynsham could be brought forward either as an addition to the allocation or as safeguarded land.

**Change to the policy requested:**

**Respondent Number:** 275 **Comment Number:** 6 **Respondent Name:** Redrow Homes South West

**Respondent Organisation:**

**Agent ID:** 164 **Agent Name:** DLP Planning Consultants

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA32

**Location:**

## Comment made on the Proposed Change:

Support: 

No reference is made to land west of Keynsham in Paragraph 3.19A

The extent of the 'alternative option' identified on the plan at Annex 3 at Lays Farm, and identified with a potential capacity of 50 dwellings is based on wholly erroneous information as to the nature and position of a gas main shown on the (unnumbered) plan attached to the SHLAA and referred to by Arup in its review of Green Belt. This does not accord with the records held by Wales and West Utilities Ltd who own and operate the pipeline. The actual route of the pipeline runs some 100 metres further to the west (Ref: W&WU Pipeline Plan and letter from W&WU dated 12.06.2013 and attached at Appendix A to the Landscape and Visual Appraisal).

The impact of the existing pipeline on the development potential of the site is consequently minimal and certainly not such that would warrant disregarding it completely as a sustainable option. Moreover, it is feasible to divert the main, and Redrow have recently done just that elsewhere in Bristol, and by using modern materials it would further reduce any no-build easement to 6m.

This inaccurate information appears to have been the principal reason for Arup dismissing the land at Lays Farm as a serious option for release from the Green Belt, without properly assessing the scope for development here having regard to the purposes of Green Belt and in particular: preventing neighbouring towns merging into one another (i.e. Keynsham and Bristol); and preserving the setting and special character of historic towns (in this case, the Queen Charlton Conservation Area).

The site, south of Lays Farm (Ref: Area 10 BANES Sustainability Appraisal Report Annex L) is bound on two side by development and forms a far more logical addition to the built-up area of Keynsham than that proposed to be released from the Green Belt to the south (Ref: Area 13 BANES Sustainability Appraisal Report Annex L).

The Site is located adjacent to Charlton Road as it enters Keynsham from the south. It occupies an area of approximately 7.8 ha and is currently given over to pasture. Its northern and eastern boundaries are formed by built form, with its southern and western boundaries being rural in nature.

There is currently no public access onto the Site, although a well-used footpath runs along its southern boundary. There are no significant landscape features on the Site, other than the hedgerows which form the field boundaries.

The Site sits at an elevation of 72.5m AOD to 59.5m AOD, and is broadly flat in nature, sloping slightly downwards to its eastern boundary with Charlton Road.

The Site's landscape and visual relationship with its surroundings is primarily with the landscape of the Charlton Valley and Stockwood to the west.

The Site sits within the LCA5 'Dundry Plateau' of the Rural Landscape of Bath and North East Somerset, a rural Landscape Character Assessment and has an 'open' character, typical of this area.

The visual appraisal (attached) showed that the Site is partially visible from several locations to the west, but generally within the context of existing built form.

BANES has, through its consultants, Arups, reviewed the Green Belt gap between Keynsham and Stockwood and identified and noted the easternmost field on the Lays Farm Site as potentially suitable for development. This area is outlined as part of Alternative Option KM3 in Annex 3 of the Schedule of Core Strategy Amendments - November 2013.

Arups' West Keynsham Development Concept Options Report (March 2013), should be reviewed, as it placed an existing high pressure gas main inaccurately on the Lays Farm Site, and also incorrectly presumed an overly wide easement zone associated with it. The incorrect location of this main heavily influenced Arups' 'Developable Area' which has fed through into the Schedule of Core Strategy Amendments.

In light of these inaccuracies the Site was revisited and the reappraised with particular consideration being given to: (1) Potential visual impact across the Charlton Valley; and (2) The setting of Queen Charlton (Conservation Area).

The landscape development strategy for the Site (see attached) has evolved out of the findings of the landscape and visual appraisal and the now correctly located, high pressure gas main. The proposal is to introduce development into the north-

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eastern part of the Site, set back from the western boundary and to introduce a significant strip of structure planting that is complementary to that which is found in the locality.

The introduction of a robust, defensible edge would ensure that in the long term the setting of Queen Charlton and the character of the Charlton Valley are not adversely affected by the introduction of development. Similarly the 'rounding off' of development in this south-eastern corner of the town, and the inclusion of the woodland strip would ensure that the separate identities of Keynsham and Queen Charlton are preserved as well as ensuring that there would not be a future coalescence with Stockwood to the west.

As such we do not believe development on the Site would compromise the purposes of the Green Belt (Ref: NPPF Para 80) with particular reference to preventing Keynsham merging with Bristol and preserving the historic setting and special character of Queen Charlton.

As a consequence of the above, the Site should be considered for inclusion within the land to be removed from the Green Belt and allocated for up to 150 dwellings.

**Change to the policy requested:**

Development on the edge of Keynsham

3.19 A In order to meet the need for additional development within the District during the Plan period, land is removed from the Green Belt to provide for housing and employment floor space in two three locations on the edge of Keynsham on the eastern, south western and western edge of the town.

Through Policies KE3A and KE4 and KE4A respectively land is allocated for residential and employment development adjoining east, west and south west Keynsham and a revised detailed Green Belt boundary is defined. Policies KE3A and KE4 and KE4A also outline the place-making principles to be met in delivering development on these sites. The place making principles are also indicated on concept diagrams for each site.

**Respondent Number:** 2564 **Comment Number:** 23 **Respondent Name:** **Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA32

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

9. Development on the eastern edge of Keynsham is supported in principle; however, we consider that the northern site should contain a mix of housing and employment and that further land should be identified to ensure flexibility in delivery to meet the objectively assessed need and deliver the required affordable housing.

**Change to the policy requested:**

**Respondent Number:** 4803 **Comment Number:** 17 **Respondent Name:** Simon Steel-Perkins **Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA32

**Location:** Land adjoining East Keynsham

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

9. Development on the eastern edge of Keynsham is supported in principle; however, we consider that the northern site should contain a mix of housing and employment and that further land should be identified to ensure flexibility in delivery to meet the objectively assessed need and deliver the required affordable housing.

**Change to the policy requested:**


**Respondent Number:** 4937 **Comment Number:** 2 **Respondent Name:** John Aldridge

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA32**Location:**

**Comment made on the Proposed Change:**Support: 

The Core Strategy includes significant additional housing for Keynsham that will stretch the infrastructure of the town. A recent proposal by the River Regeneration Trust to build a marina with many houses would not sit alongside the B&NES proposal as the two schemes would be too big an expansion for the area. If a choice needs to be made between the two, I think that the B&NES proposal would be least damaging to the environment as the River Regeneration Trust scheme is likely to multiply boat movements along the River Avon by four (based on the existing marina and river banks having 100 berths and the new marina 300 more). The river is an environmentally sensitive area with at least two species of scarce dragonflies, and Otters have been making a comeback.

**Change to the policy requested:**


**Respondent Number:** 5083 **Comment Number:** 1 **Respondent Name:** Derek Hart

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA32**Location:**

**Comment made on the Proposed Change:**Support: 

K3A and K4 should stay in the Greenbelt. Otherwise towns will simply merge together, there will be negative environmental impacts if they are built upon and this would negatively affect future generations. We need to retain the greenbelt to have a small but positive impact upon global warming ie retaining trees, biodiversity etc.

**Change to the policy requested:**

I do not think Areas K3A and K4 should be removed from the Greenbelt.

**Change Reference:** CSA33 Land adjoining East Keynsham

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 93 **Comment Number:** 4 **Respondent Name:** Highways Agency**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:** Land adjoining East Keynsham**Comment made on the Proposed Change:****Support:** 

The site-specific placemaking principles in respect of transport are broadly supported. However, whilst para. 12 states that vehicular access to both the A4 and Chandag Estate are required, allowing for a through bus route, the accompanying concept diagram shows the link to the Chandag Estate as being a potential vehicular route only. The Agency considers the ability to provide a through bus route to be important and therefore the concept diagram should be corrected to reflect this.

**Change to the policy requested:****Respondent Number:** 279 **Comment Number:** 6 **Respondent Name:** Rohan Torkildsen**Respondent Organisation:** English Heritage**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:** Land adjoining East Keynsham**Comment made on the Proposed Change:****Support:** 

Change ref: CSA34 Strategic Allocation East Keynsham Placemaking Principles  
The proposed positive design response to the Roman Road is noted.

**Change to the policy requested:****Respondent Number:** 837 **Comment Number:** 10 **Respondent Name:** David Redgewell**Respondent Organisation:** South West Transport Network Railfuture**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:****Support:** 

A Park & Ride site bus based in Whitchurch with 3000 car park site could link to Whitchurch Hengrove Centre, Hospital in Bristol (link to Metro West buses Hengrove to North), Whitchurch Village New housing development KE3E in Keynsham to Keynsham town centre, Ashton Way, Bus station and Keynsham railway station on Metro West project link Bristol TM, Keynsham railway station, Saltford new station, Oldfield Park, Bath Spa, Bathampton new station, Freshford, Avoncliffe, Bradford-on-Avon, Trowbridge, Westbury, Frome, Warminster.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

<b>Respondent Number:</b> 837	<b>Comment Number:</b> 11	<b>Respondent Name:</b> David Redgewell	<b>Respondent Organisation:</b> South West Transport Network Railfuture
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**Agent ID:**      **Agent Name:****Further Information available in the original comment?**     **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:****Support:** 

The Housing Association need to increase due to its close planned development around the A4 corridor for Bus services between Bristol Temple Meads, Brislington, Keynsham, Saltford and Bath, with X39 bus services 338, 339, A4 along the corridor.

More site allocation could be made towards Manor Road, Broadleaze Nursery and Glenavon Farm. Keynsham has a railway station on the Metro West West of England Partnership rail network.

**Change to the policy requested:**

<b>Respondent Number:</b> 1189	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Mr Duncan Hounsell	<b>Respondent Organisation:</b>
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**Agent ID:**      **Agent Name:****Further Information available in the original comment?**     **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:** Land adjoining East Keynsham**Comment made on the Proposed Change:****Support:** 

I welcome the maintenance of the existing housing development boundary at Saltford and the protection of the Green Belt surrounding the village which are considered vital for preserving the identity and character of Saltford. For example, I am strongly opposed to the Mactaggart & Mickel Ltd proposal (Appendix C) to build on the western side of Saltford, i.e. in excess of the "strategic land allocation adjoining East Keynsham" put forward by B&NES. That proposal would effectively close the protective gap between Keynsham and Saltford, the main purpose of the Green Belt designation at this location. Traffic volumes on the A4 at Saltford have decreased by 7% since the peak of 2002. Nevertheless, the A4 remains heavily trafficked at peak times. Policies should be adopted at these proposed housing and industrial development sites that include the promotion of sustainable, public transport solutions such as a re-opened commuter railway station in Saltford. I welcome the fact that the strategic site allocation at EAST KEYNSHAM will prevent an unwelcome local by-pass route for Saltford skirting the village on the south side beginning at the Broadmead roundabout, Keynsham. This would lead to speculative in-filling with large housing estates and also loss of trade to Saltford's businesses dependent on passing trade. Any support for a local by-pass in the Saltford Parish Plan was contingent on increased volumes of traffic on the A4 when the fact is that traffic volumes have declined overall and the majority of Saltford residents no longer wish for a by-pass because of its negative effects.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

**Respondent Number:** 2564 **Comment Number:** 24 **Respondent Name:** Peter Brett Associates  
**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Respondent Organisation:** Waddeton Park Limited

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

Support:

10. The principle of development on this site is supported, and we agree that the site can be accessed off the Bath Road. However, the extent of the site is being inappropriately limited with artificial constraints and to make use of the full opportunity, to increase the provision of essential affordable housing and to ensure flexibility in delivery, the land identified for development should include further land to the east. It appears that the site north of the A4 is allocated solely for employment uses and we object to this restrictive land use allocation as set out in placemaking principle 2. If the employment allocation is retained it is unlikely to be delivered by the landowner. The site is capable of delivering housing and as such should be recognised for the contribution it could make to the much needed housing land supply that is required. As part of a housing or mixed use allocation, the proper regeneration of the area could be properly achieved.

**Change to the policy requested:**

**Respondent Number:** 3017 **Comment Number:** 1 **Respondent Name:** Mr Anthony Orley  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**

Support:

1. FOREWORD

My name is Anthony Orley and I have lived on the A4 in the vicinity of the Grade 2 listed building Ellsbridge House for the last 37 years. Over this time I have established a reasonable knowledge of this area including its history, the environment and its wildlife. I also have a lot of experience living with the A4 traffic flow capabilities, including its dangers and its traffic congestion. The following comments and observations are based on my experience and knowledge of this area and are therefore specifically relate to the Banes Core Strategy proposed policy for the land area:

KE3A EAST KEYNSHAM: LAND TO BE REMOVED FROM THE GREEN BELT FOR DEVELOPMENT. And secondary to KE3B EAST KEYNSHAM: LAND TO BE REMOVED FROM THE GREEN BELT AND SAFEGUARDED FOR DEVELOPMENT BEYOND THE CORE PLAN 2029 END DATE. The Banes proposals are as identified in the Banes Schedule of Core Strategy Amendments November 2013.

2. SUMMARY

2.1 I have studied not only the Banes Core Strategy Amendments November 2013 but also a number of the critical surveys and studies conducted by or used by Banes to try to support these proposed amendments. I also attended a November 2013 Banes Core Plan Amendments Consultation to review the situation. After these events I can only come to the conclusion that the Banes proposed KE3A and KE3B policy proposals include some key and critical plans, surveys and reports with UNJUSTIFIED AND UNSOUND strategies and conclusions. These all attempt to support the KE3A and KE3B November 2013 proposals. In my opinion, and with my knowledge of this area built up over 37 years, the KE3A and KE3B proposals are UNSOUND and have failed to take proper account of the following serious and irreversible damage they will cause:

a. Critical damage to the already acute peak periods traffic flow on the A4 road between East Keynsham and Saltford

which has a high potential of widespread consequences for other major regional road networks. Deliberately injecting more traffic directly into the most constrained bottleneck on the A4 between Brislington and Bath is a seriously flawed and UNSOUND strategy.

B. Destruction on KE3A of a long established ecosystem of historical hedged pastureland fields of wild flora and grass mix. This biodiversity rich eco system with its fresh water stream is flourishing because none of it has been contaminated by pesticides, insecticides or chemical fertilisers. This is wanton destruction of a self sustaining and irreplaceable eco-system which has developed over many years.

C. Total destruction on KE3A of the creatures that flourish and depend on this chemical free eco system. On KE3A the flora and hedgerows and fresh water stream support a strong population of varied species of birds, bumblebees and butterflies, moths and both ground based and flying insects. The flying insects provide sustenance for a local roost of bats. The bat colony has foraged over parts of KE3A for at least the last 37 years. Bats are a protected species under UK and EU legislation.

D. Irreversible destruction of a 15th century landscape of medieval lynchets and failure to connect this unique high impact landscape with the existing protected 18th century Grade 2 listed Keynsham Manor House on the nearby southern boundary of this land. This historical combination should be protected not destroyed.

The statements made above are supported by the observations and evidence which I am providing under the headings below:

- BANES TRANSPORT ACCESS ASSESSMENT FOR EAST KEYNSHAM NOV 2013 is MINIMAL, INCONCLUSIVE & UNSOUND. This is a key and critical Banes assessment in relation to the KE3A and KE3B approval process. See my comments, observations and evidence in SECTION 3 BELOW.

- BANES PRELIMINARY ECOLOGY ASSESSMENT FOR EAST KEYNSHAM – LAND TO THE SOUTH OF THE RAILWAY LINE has IMPORTANT DATA OMISSIONS BECAUSE OF NEW EVIDENCE PROVIDED AND AN UNJUSTIFIED IMPACT STATEMENT WHICH MAKES THE PRELIMINARY ASSESSMENT UNSOUND. The survey is a key and critical assessment being used by Banes in relation to the KE3A and KE3B approval process. My comments, observations and evidence have been submitted on a SEPARATE BANES COMMENT FORM.

- BANES VISUAL AND LANDSCAPE ASSESSMENT FOR EAST KEYNSHAM – LAND TO THE SOUTH OF THE A4 has ASSESSMENT FAILINGS. This is a key and very important assessment in relation to the KE3A and KE3B approval process. My comments, observations and evidence have been submitted on a SEPARATE BANES COMMENT FORM.

3. BANES TRANSPORT ASSESSMENT FOR EAST KEYNSHAM IS MINIMAL, INCONCLUSIVE & UNSOUND  
REFERENCES:

A: TRANSPORT ACCESS ASSESSMENT FOR EAST KEYNSHAM NOVEMBER 2013.

B: BANES CORE STRATEGY TRANSPORT EVALUATION REPORT/037/13 ISSUE FEBRUARY 2013 (ISSUE 1.2.DOCX) APPENDIX

E: LAND ADJOINING EAST KEYNSHAM EVALUATION.

3.1 The latest Nov 2013 transport access assessment for East Keynsham at Ref A is a very limited statement consisting of a couple of small paragraphs which acknowledges that a very detailed traffic assessment will have to be carried out at a much later stage. Until then it will not be known if a crucial bottleneck section of the A4 road can sustain the KE3A and KE3B developments or not. So we have a situation here where it is proposed large swathes of sensitive land are to be taken out of the green belt for development by the Banes Planning Department. Meanwhile the Banes Highways Department has no viable transport plan to support the KE3A and KE3B proposal other than what amounts to a few minimal 'maybe' statements and a few red arrows on a map showing primary access points onto the A4 road. This high risk and unsound policy is based on unsound presumptions. To see how high risk and unsound it is please read the observations and evidence below.

3.2 The Banes Highways Department did carry out an attempt at a more detailed evaluation in Feb 2013 under Ref B. In that report the Highways Department acknowledged that the stretch of A4 road from Keynsham East and through the community of Saltford "is constrained and there is no scope for capacity improvement within the existing corridor". The Feb 2013 assessment Ref B also says at section E1.5 that "the highways impact of development is largely along the A4 and into Keynsham and while there is some scope for mitigation residual impact will remain on these congested corridors". To overcome this stark reality an attempt was made in Ref B to use mitigation in order to support the Banes Planning Department KE3A and KE3B development proposals. An alarming statement was made that housing and industrial development in this area would have minimal impact on existing road conditions. This presumption dressed up as

mitigation was based on a judgement that the majority of people on the new residential and industrial developments will walk, cycle or bus to and from work. AFTER ATTENDING A NOV 2013 BANES CORE PLAN AMENDMENTS CONSULTATION IT WAS CLEARLY EVIDENT THAT THIS PRESUMPTION STILL EXISTS.

There is absolutely no evidence to support this naïve presumption. In fact the 2011 National Census identified that Keynsham East Ward journey behaviour is predominantly 70% by car. It is high risk to presume that people living in a new urban sprawl development on the east side of Keynsham will be any different. People have all sorts of work skills and careers which will take them much further afield than Keynsham or the proposed new Industrial Units on the north side of the A4 road. The only current hard fact evidence available is that 70% of them are likely to travel to and from work by car.

The new Industrial development, just like the existing industrial development, will also bring more traffic into this constrained strip of road. The increase and the type of traffic from cars to heavy industrial transport is an absolute unknown and unidentified equation. All I can say from my own personal observations and photographic evidence is that people who work in the existing industrial development rely very heavily on cars as their means of transport. There are also a number of companies on the existing developments who operate fleets of vehicles. These include a large milk delivery fleet, several heavy transport depots, a recycle refuse collection fleet and a mobile crane company.

What will the proposed new KE3A 30,000sqm of additional industrial development hold in store? It is inevitable that more road congestion pressure will be injected directly into the constrained A4 corridor. This will come from the industrial units fronting onto the A4, from industrial traffic into Pixash Lane onto the A4, and from the industrial traffic which the Highways Department want to divert through the existing industrial area and then onto the A4 at the Broadmead Roundabout. The Highways Department seem to be unaware that the A4 in this area including the Broadmead Roundabout is heavily congested with traffic already at peak periods.

All this adds up to very serious questions about the future traffic flow capability of the A4 road at peak periods if the KE3A and KE3B proposals go ahead. The Banes Highways Department and the Planning Department have no viable answers or strategy in place if a disastrous A4 traffic situation is created. This argument and evidence is developed further in paragraphs 3.3 and 3.4 below. What is certain is that all this will not be acceptable to the multi thousands of motorists, commercial vehicle drivers and bus passengers who are dependent daily on the main A4 route between Bristol and Bath. They already endure misery from Monday to Friday every week during the long morning and evening A4 peak period traffic jams.

3.3 The Feb 2013 and the Nov 2013 Transport assessments also briefly indicate that in the event of the K3A and K3B developments going ahead it will be necessary to introduce new roundabouts or traffic light controlled junctions along the constrained stretch of the A4. The assessment also identifies that major changes to the A4 Broadmead roundabout may also be necessary. None of this will help alleviate increased traffic jams at peak traffic periods.

The A4 is the major route between Bristol and Bath and the A4 bottleneck between Keynsham East and through Saltford causes wide spread peak period traffic congestion on this road every working day. The congestion for east bound traffic stretches all the way back from Saltford, down and around the Broadmead Roundabout and up the Keynsham by-pass as far as the eye can see. All access roads onto the A4, from and including Broadmead Roundabout and all the way through Saltford also get jammed up.

Deliberately planning to inject more residential and industrial development traffic directly into this bottleneck at peak periods will have only one consequence and that is chaos at the junctions. At the moment just one person using the traffic light controlled crossing in Saltford during peak period traffic brings the congested traffic on the A4 to a grinding halt. In Banes Highways Department own words (Ref B) "there is no scope for capacity improvement within the existing corridor". Other than by-passing Saltford there is no other A4 corridor option. The KE3A and KE3B development proposals would block any future A4 by-pass option to the south of Saltford. The northern route for a possible by-pass is already dead and buried.

The stretch of road between Keynsham East and Saltford is not the place to try experiments with a high risk strategy which is highly dependent on a naïve, untried and untested attempt at 'walk, cycle, bus' social engineering mitigation. The Banes Highways Department and the Planning Department, whatever they do, or whatever they provide, will have no control over the outcome of this wish list whatsoever. The Banes Transport Access Assessment does not provide a highways engineering solution to rescue the situation if the attempt at social engineering mitigation proves to be unfounded and goes wrong. The Banes Highways Department already knows "there is no scope for capacity

improvements within the existing congested corridor.” They have already said so in Ref B. The statement in Ref B is absolutely correct. So why are they now contemplating injecting more traffic and more obstacles, in the form of junctions, directly into the existing constrained corridor just in order to accommodate the Banes Planning Department KE3A and KE3B development proposals. This is UNSOUND strategy with the high potential of having very serious irreversible consequences for the A4 to remain functional at peak traffic periods in the future.

3.4 The Highways Authority when it had control of trunk roads was consistent in not allowing new access or junctions onto this constrained stretch of the A4. They had good reason for doing this. As traffic in general and traffic congestion has increased their sensible approach has been justified in full. Just because the responsibility for the ‘A’ class roads has been devolved to the Highways Department of local authorities the roads are still the same roads. The need and responsibility to keep the ‘A’ roads flowing as freely as possible for as long as possible is still as important as ever. This should take precedent over development proposals from anybody including local planning authorities. If the proposed development jeopardises or puts at risk the capability of the ‘A’ road to cope with future traffic demands the Highways Department has a responsibility and a duty. This is to ensure the highway is their prime objective for protection and not the development. The A4 and the KE3A and KE3B development proposals fall very much into this category.

3.5 Recent A4 Traffic Incident: The following shows how sensitive the whole A4 network and other road networks dependent on the A4 are to just a single incident at any constrained strategic point on the A4. In this instance the strategic point is in the very area where it is proposed to introduce more obstacles in the form of new access junctions onto the A4 to accommodate the KE3A and KE3B housing and industrial developments:

On Friday 29 November 2013 at approximately 1545 there was a serious accident on the A4 Broadmead roundabout which tragically involved serious injury to a cyclist. The police had to close off the last segment of the roundabout for traffic going east towards Bath. A diversion for east bound traffic was set up through the nearby Ashmead industrial estate, into Pixash Lane and back onto the A4 further up the road. This single incident caused the A4 road traffic to jam up during the peak period. I have been informed by people caught up in this traffic and from radio traffic congestion warnings that the A4 jam stretched from the Keynsham Broadmead Roundabout all the way back to the Brislington district of Bristol. It also caused traffic on the A4174 Bristol ring road trying to connect with the A4 at the Bristol end of the Keynsham by pass to jam up. This jam went all the way back to the Bristol district of Kingswood. Resulting blockages also occurred on lots of tributary roads off the A4174 and elsewhere. The A4174 is a vital link road to the M4 and M5 motorways. It was an absolute traffic nightmare which took hours to clear. So although the police were successfully diverting traffic off the A4 Broadmead Roundabout to go east towards Bath it could not prevent this huge widespread six mile jam up taking place. The marginal reduction in flow rate made all the difference. The Highways Department should take serious note of this incident and its consequences in relation to the high risk traffic strategy currently being put forward to accommodate the KE3A and KE3B developments. For the reasons identified in paragraph 3.3 and 3.4 above the current proposals have the potential of making the existing A4 daily peak period traffic congestion even bigger, more robust, more widespread and potentially unmanageable.

**Change to the policy requested:**

I sincerely hope that the Banes Highways Department will take another look at their traffic access assessment for KE3A and KE3B. They should drop their total dependence on the incredibly high risk and naive “walk, cycle bus” social engineering mitigation strategy over which they have absolutely no control. The Highways Department should base their assessment on what they are good at. That is hard fact and professional realism and applying it to protect the A4 highway over which they do have a duty of control (see section 7 of this response paragraph 3.4).

2. The Banes Planning Department should be made fully aware that the current traffic access assessment mitigation for KE3A and KE3B is critical high risk wishful thinking rather than sound strategy. The Planning Department should also be made aware that the high risk strategy of putting new traffic access points directly into the A4 bottleneck to gain access to KE3A and KE3B has the high potential of making the A4 between the east side of Keynsham and Saltford unmanageable during peak traffic periods. As identified in section7 para 3.3 and para 3.4 above there will be no way of retrieving the situation after the event. It is the Banes Highways Department responsibility to make sure these critical risks to the A4 are made absolutely clear right now to the Banes Planning Department in relation to their current KE3A and KE3B proposals. The Banes Planning Department seem to be completely unaware of all this at the moment because in their ‘Placemaking Principles’ document it is relying on ‘Off site capacity improvements required, including the A4 and Broadmead Roundabout....’ to be put into place by the Banes Highways Department. That is not possible because the Highways Department in their February 2013 traffic assessment made it quite clear that the stretch of road from East Keynsham and through the community of Saltford ‘is constrained and there is no scope for capacity improvement within the existing corridor’. Banes Planning Department must also be made aware that there is no other corridor and never will be if they go

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ahead with the KE3A and KE3B development proposals.

3. On a map KE3A and KE3B may seem a good place to propose new development. In reality it is not so. It is therefore requested:

a. The Banes Planning Department should seriously review its position on KE3A and KE3B and the high risk unfounded, untested, and naive strategy it is following. The capability for the A4 Bristol to Bath road to remain functional at peak traffic times far into the future is much more important than KE3A and KE3B.

If the Banes Planning Department insists on going ahead with the KE3A and KE3B proposal then:

b. It is the Banes Planning Department and Highways Department responsibility and duty to ensure the critical high risk transport access strategy in relation to KE3A and KE3B, including all criticism of the transport strategy, is brought urgently and specifically to the attention of the Banes Core Strategy Plan Government Inspector.

c. The consequences of the Banes Highways Department and Planning Department KE3A and KE3B high risk strategy for the A4 highway is potentially critically serious for not only the A4 but also for the knock on impact on other major regional road networks as well. See section 7 paragraph 3.5 of this response form. Because of this the strategy, and criticism of the strategy, should also be brought to the attention of the Department of Transport Minister for appraisal.

**Respondent Number:** 3017 **Comment Number:** 5 **Respondent Name:** Mr Anthony Orley

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

Support:

BANES RESPONSE FORM SECTION 7

### 1. FOREWORD

The following comments and observations specifically relate to the Banes Core Strategy proposed policy for the land area:

KE3A EAST KEYNSHAM: LAND TO BE REMOVED FROM THE GREEN BELT FOR DEVELOPMENT. And secondary to: KE3B EAST KEYNSHAM: LAND TO BE REMOVED FROM THE GREEN BELT AND SAFEGUARDED FOR DEVELOPMENT BEYOND THE CORE PLAN 2029 END DATE. The Banes proposals are as identified in the Banes Schedule of Core Strategy Amendments November 2013.

### 2. BANES VISUAL AND IMPACT ASSESSMENT POLICY ISSUES RELATED TO KE3A AND KE3B

#### REFERENCES:

A: DOCUMENT CD9/LV/7 – KEYNSHAM EAST LANDSCAPE & VISUAL ASSESSMENT CONDUCTED BY BANES COUNCIL including Addendum to original report.

B: BANES REPORT - EAST KEYNSHAM HERITAGE ASSET STUDY.

2.1 The Landscape & Visual survey at reference A identifies and acknowledges the landscape and its features in areas C1 and C2 (KE3A) is a landscape of historical value. The survey identifies these hedged fields as being most distinctively long and narrow having characteristics of remnant medieval strip lynchets. The survey also identifies the medieval strip lynchets do not extend beyond the combined C1 and C2 (KE3A) area land which is on the south side of the A4 road.

2.2 The survey acknowledges it is unusual to see a medieval field pattern of this kind still maintained.

2.3 The survey also identifies there are too many hedges in this medieval landscape to maintain them within a KE3A development especially as they run across rather than around the site. The survey goes on to say the medieval lynchets are clearly highly susceptible to change from development and it will not be possible to maintain any sense of pattern within a development. The survey identifies that loss of the medieval lynchets landscape will be 'High Impact'.

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2.4 The survey also acknowledges the Grade 2 listed 18th century Keynsham Manor House sited on Manor Road on the southern boundary of the C1 and C2 landscape. The survey comes to a somewhat thoughtless and blinkered conclusion that impact on the Grade 2 Manor House will not be affected by any development on the C1 and C2 (KE3A and KE3B) land. The reasoning given for this conclusion is looking north from the historic Grade 2 building the Manor Road forest will be on the left and directly straight ahead will be some open fields. These open pasture land fields will be the remnant offering of green belt land between the communities of East Keynsham and Saltford which will remain protected if development goes ahead on the historic C1 and C2 (KE3A) landscape. Note: Recent action has seen even the remnant offering of green belt on the Grange Road Saltford side is now coming under attack from a property developer.

2.5 The Banes 'Visual and Impact Assessment' conclusion fails to recognise the historical significance of the whole landscape area. We have a Grade 2 listed 18th century Manor House and nearby a 15th century medieval landscape of hedged fields C1 and C2 (KE3A). These are in the form of medieval strip lynchets. These fields would almost certainly have been within the jurisdiction of the old Manor House in the 18th century. This unique combination is surely worthy for consideration for a Historical Conservation Order. Instead the 'Landscape and Impact Survey' (Ref A) allows other low impact factors, like the view from the A4 road, to lower the overall development impact grading for this historical landscape from 'High Impact' to 'Medium & Negative Impact'. Taking the above comments into account this lower grading is unjustified and unacceptable.

This whole impact situation is aggravated further by the fact that the alignment of the sunken old 'Abonae' to 'Aqua Sulis' Roman road runs from west to east through the central area of the KE3A medieval landscape and continues onwards through KE3B. The Banes Placemaking Principles for the east Keynsham Land acknowledges the Roman Road alignment and indicates the route should be preserved. However the Banes Concept Diagram for the land adjoining East Keynsham shows that all the hedgerows forming the current 15th century medieval lynchets as being wiped out. Only a couple of peripheral hedgerows on the boundary of the KE3A area will remain. The Banes development proposal for KE3A is willing to destroy a highly visible, high impact and intact 15th century medieval landscape. The alignment for the old Roman road runs west to east directly across the central area of this 15th century landscape. What hope can there be for even any remnants of the old Roman road to remain undisturbed if developers get onto the KE3A green belt land.

The original Banes Core Plan Strategy proposals protected and retained all the sensitive green belt land between the communities of East Keynsham and Saltford. Now it seems features of historical interest important to local communities and future generations are being sacrificed in order to get a Core Plan Strategy approved.

**Change to the policy requested:**

## BANES COMMENT FORM SECTION 8

For the reasons given in section 7 above it is requested Banes Council and other national authorities including English Heritage and the Government Inspector take a good hard look at what is happening here. Action needs to be taken to recognise and protect our unique remaining heritage in this area not to destroy it. It may not be highly important from a national heritage viewpoint but it is highly important for the communities of Keynsham and Saltford that local historical land features are retained for future generations. The KE3A and KE3B land between East Keynsham and Saltford should be retained within the green belt. In support of this statement it should be noted the KE3A and KE3B land areas may appear to be acceptable areas to develop for housing and industry but in fact they are not.

**Respondent Number:** 3017 **Comment Number:** 3 **Respondent Name:** Mr Anthony Orley

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**Support: 

## 1. FOREWORD

The following comments and observations specifically relate to the Banes Core Strategy proposed policy for the land area: KE3A EAST KEYNSHAM: LAND TO BE REMOVED FROM THE GREEN BELT FOR DEVELOPMENT. And secondary to: KE3B EAST KEYNSHAM: LAND TO BE REMOVED FROM THE GREEN BELT AND SAFEGUARDED FOR DEVELOPMENT BEYOND THE

CORE PLAN 2029 END DATE. The Banes proposals are as identified in the Banes Schedule of Core Strategy Amendments November 2013.

## 2. ECOLOGY – BANES ASSESSMENT FAILURES AND OMISSIONS

### REFERENCES:

A: Document CD9/E11 – Keynsham East - South of the Railway Preliminary Ecology Survey Conducted by Nicholas Pearson Associates on behalf of and commissioned by MacTarget & Mickel Homes Ltd. NOTE: This report is being used by Banes Planning Department with permission of the commissioning authority as a Banes key supporting document for the proposed development of land KE3A and KE3B.

B: Banes Strategic Site Allocation Land Adjoining East Keynsham Concept Diagram.

C: Banes Land Adjoining East Keynsham Placemaking Principles.

2.1 FOREWORD: My name is Anthony Orley and I have 37 years of knowledge gained from living in this district. Over time I have been able to recognise the strengths and weaknesses of some of the wildlife which populate this area. Because of this I will concentrate my response specifically to the KE3A and secondary to the KE3B ecology issues which arise in Ref A. I also want to raise issues with some of the policy statements made by Banes in the Core Plan documents Ref B and Ref C which relate to habitat issues on KE3A and KE3B.

2.2 ISSUES ARISING WITH THE PRELIMINARY ECOLOGY ASSESSMENT REF A: This is a key supporting document in the Banes justification for the proposal for development on the KE3A and KE3B land. The document has failures, omissions and an unjustified impact statement which makes the Banes key document unsound for the following reasons:

a. In the introduction section 1 of the Preliminary Ecology Assessment Reference A it states:

- Potential ecology constraints are highlighted in broad terms only.
- No impact assessment of any potential development is provided.
- No mitigation proposals are discussed.

The preliminary ecology assessment summary then goes on to record habitats on the KE3A and KE3B land areas which have been identified as being potentially suitable for wildlife including protected species bats, dormice, reptiles, brown hare, great crested newts and barn owls. It also raises other ecology and habitat issues which need further investigation. It says 'In order to support an outline planning application a Phase 2 ecology survey is recommended.' Taking into account the statements made above i.e.

- No impact assessment of any potential development is provided.
- No mitigation proposals are discussed.

The report In section 5 then goes on to contradict itself by discussing mitigation and then goes on to contradict itself again by making an impact statement which ends by saying 'the land between Keynsham East and Saltford (KE3A and KE3B) has the capacity to accommodate the extent of development proposed in the Banes Core Strategy changes without unacceptable ecological impacts'. This conclusive statement is unfounded, unjustified and unsound and has no place in a preliminary ecology assessment. This especially applies when the assessment itself admits there are so many unknowns still outstanding in relation to the ecology of the KE3A and KE3B land areas\*. I will provide evidence on how unfounded, unjustified and unsound this all is.

\*It should be noted the Ref A preliminary ecology assessment although prepared for a property developer has been adopted by Banes planning Department as one of their key supporting documents. It is listed as key new evidence as Objective 14 in the 'Banes Core Strategy Green Belt Site Allocations Sustainability Appraisal document Annex O' (CD10/A1/3).

This leads me onto the next point of issue:

b. In the Preliminary Ecology Assessment (Reference A) it states that a records assessment was made by checking the 'Bristol Environmental Records Centre (BRERC)' data for the KE3A and KE3B land areas for the following information:

- Protected and notable flora and fauna within a 3km zone of the site.
- Bat species within 4km of the site.

The BRERC records show there is substantial bat activity recorded in the KE3A area i.e.

- Common Pipistrelle roost on Southern boundary of KE3A.
- Soprano Pipistrelle roost in Manor Road Community Woodland within 300m of the KE3A southern boundary.
- Both above species activity also recorded 500m to the northwest of KE3A.

The preliminary ecology assessment (Ref A) confirmed the existence of the Manor Road Community Woodland roost and also identified potential bat foraging and commuting routes throughout the KE3A and KE3B areas on both sides of the A4 road.

However there is one bat colony that the BRERC records and the preliminary ecology assessment Ref A missed completely. There is a colony of bats with a woodland roost within 100m of the A4 road boundary of the KE3A land area. These bats cross over the A4 road and forage in a KE3A field on the south side of the A4 directly opposite the Grade 2 listed building Ellsbridge House. They have been doing this for at least the last 37 years. The implications this has on the core strategy proposal to place development on KE3A is provided in section 2.4 below. Bats are a protected species under UK and EEC law.

C. Other protected species visually sighted on the KE3A land area: These are protected species besides bats which I have personally seen on the KE3A land area:

- Birds – Redwing and Barn Owl: protected under current UK legislation through the Wildlife Act 1981 (as amended) Schedule 1 Species of the Wildlife & Countryside Act 1981. Red & Amber lists. Birds of Conservation Concern 2009.

A number of personal sightings of Redwing have been made over the last 10 years and two sightings of barn owl over the last 10 years. All sightings were made in the KE3A land area specifically in the field on the south side of the A4 road directly opposite the Grade 2 listed building Ellsbridge House. It should also be noted an owl has been heard hunting over this same area at night on a number of occasions within the last two months.

Hedgehog – protected under section 6 of the Wildlife & Countryside Act 1981 (as amended).

Personal sightings have been made in the KE3A land area within the last 12 months specifically in the field on the south side of the A4 road directly opposite Ellsbridge House. Other personal sightings made in nearby gardens.

Note: None of the above sightings of protected species were reported and do not appear in the BRERC records.

2.3 FURTHER ISSUES WITH THE PRELIMINARY ECOLOGY SURVEY (REF A) AND WITH THE BANES EAST KEYNSHAM PROPOSED KE3A AND KE3B DEVELOPMENT POLICY: I know from local knowledge and actual sightings that the KE3A land on the south side of the A4 road supports thriving populations of birds, bumblebees, butterflies, moths, insects and bats. It also supports larger creatures like roe deer and small mammals. Its hedged pastureland fields in the form of 15th century Medieval lynchets (as recorded in the Banes 'Visual and Impact Assessment') together with its fresh water shallow running stream, forms a long standing and important self sustaining eco-system.

A. The Preliminary Ecology Survey was commissioned by a property developer and is used by Banes as a key document to support the KE3A and KE3B development proposals. The survey makes particular and repeated emphasis that the KE3A fields directly to the south of the A4 are poor quality grassland. The main reason given for this assessment seems to be the grass is intermixed with a lot of traditional wild flora. As this is an ecology survey surely the question should be asked is this good or bad for the ecology of the area? The question should also be asked why is there so much wild flora supported on this pastureland? The answer is the pastureland on the south side of the A4 has not been contaminated with pesticides, chemical fertilisers or insecticides. That is one of the reasons why the flora and fauna on this KE3A pastureland live in harmony in an established and self sustaining eco-system. This is something the Preliminary Ecology Survey (Ref A) and the Banes East Keynsham proposed development policy fails to recognise or even consider. This is highlighted in the unjustified and ill conceived impact statement made in the preliminary report i.e. 'land between Keynsham East and Saltford (KE3A and KE3B) has the capacity to accommodate the extent of development proposed in the Banes Core Strategy changes without unacceptable ecological impacts'. This statement is unfounded and unjustified in a preliminary survey to imply that an established and balanced eco-system and the important and threatened species of creatures that depend upon it can survive the trauma and upheaval of a major development without there being unacceptable ecological impact. See the photograph below to get some idea as to what is at stake.

KE3A Looking South from the A4 towards the Manor Road Community Woodland early summer wild flora

B. In relation to the importance of the local bumblebee population note should be taken of Professor David Goulson who has a PhD in butterfly ecology and after 10 years of research is also a leading expert in bumblebee conservation. "Bumblebees their Behaviour, Ecology and Conservation". He set up the Bumblebee Conservation Trust in 2006. He and his colleagues discovered the loss of hedgerows, wild flowers and other flora, and the use of insecticides on crops, has been a significant factor in bringing about a dramatic fall in numbers of the bumblebee species and population. Professor

Goulson points out that many wild flowers and flora and even some cultivated plants are exclusively pollinated by bumblebees. The wild plants then provide shelter and food for numerous other insects, small mammals and birds.

C. The RSPB report "The state of UK Birds 2012" should also be noted. This revealed since 1966 we have lost 40 million breeding birds from the countryside at the average rate of one breeding pair every minute. The RSPB state this shocking statistic also applies to devastation of the populations of bumblebees and butterflies. The RSPB report identifies the most notable reasons for this massive decline is land misuse and land mismanagement.

D. The Banes Planning Department proposal to use an established and balanced eco-system of historical hedged pastureland land fields KE3A and KE3B on the south side of the A4 for destructive and traumatic development falls very much into the categories of land misuse and mismanagement. This particularly applies because this land has not been contaminated by pesticides, insecticides or chemical fertilisers. The land supports a healthy population of wild flora and fauna. It has an important and thriving population of birds, bumblebees, butterflies, moths, insects and bats. All this is now under serious threat and any key document used by Banes to support their proposed development policy should be independent. The preliminary ecology assessment document (Ref A) commissioned by a property developer makes another concluding recommendation that 'a more detailed Phase 2 survey should be carried out to support a planning application'. I agree a Phase 2 detailed survey should be carried out. However if this is done the survey should be comprehensive and take into account all new evidence to protect and recognise the ecology of the area.

2.4 KE3A BATS: The preliminary ecological survey (Ref A) has carried out a basic assessment of likely bat roosting areas on KE3A and KE3B. The surveyors also carried out a BRERC records search of surrounding areas within a 4km zone. However the surveyors missed one area completely which has been a roosting area for a colony of bats for at least the last 37 years. To be fair this area is not included in the KE3A land boundary but is within 100 metres of the immediate KE3A area. This bat roosting area is known to Banes Council because I have informed the Planning Department and the Arboriculture Department of these bats in the past. This area close to the Grade 2 listed building Ellsbridge House is partly protected by a woodland tree preservation order put in place by Banes on 05 March 2013 after a number of requests were made for them to do so. In the past I have also requested Banes carry out a protected species bat survey and place a bat preservation order on the area. I have documentation to support this. To the best of my knowledge this has not been done.

Although the bat colony roosting area is just outside the KE3A proposed development land the foraging area for these bats is not. The bats have foraged on the KE3A land for at least the last 37 years. They follow tree lines from their roosting area on the nearby north side of the A4 and fly directly over to the South side of the A4 to forage. This includes gardens but is mainly a field directly opposite Ellsbridge House. This field in the KE3A development land area is identified on the "Banes Strategic Site Allocation Land Adjoining East Keynsham Concept Diagram" (Reference B) as a primary 'vehicle access point' for the proposed KE3A development on the south side of the A4.

I know and have watched these bats forage for the last 37 years. They fly up and down the field between the tree line on the west side of the field and the wild land area adjacent to the Army houses in Harding Place on the east side. The bats forage in north/south sweeps over this eco rich area. The colony of bats, the same as other bat colonies throughout the UK, had a hard time over the previous two wet summers. However as shown this last summer the colony although lower in numbers is still surviving. If this foraging area on which the colony of bats have solely depended on for so many years is destroyed, or disturbed by the trauma of development, I have no doubt in my mind that the colony of bats itself will be wiped out.

Developing or disturbing the land on which this colony of bats are dependent for foraging, and which they have always accessed from their close by roosting area for at least the last 37 years, will be nothing less than deliberate harm. Deliberately harming bats is a criminal act by contravening 'protected species' UK and EU law.

2.5 The Banes 'Wild things Biodiversity Action Plan' which is part of the UK National Action Plan Policy includes a short list of 'Priority Species and Habitats'. Banes currently identify five priority habitats and claim to be champions for the protection of these habitats. Two of the five habitats apply perfectly to the land areas KE3A and KE3B. Banes are now proposing to remove these 'priority biodiversity habitats' from the green belt to accommodate major building development in order to meet the political needs of the Banes Core Plan. The two habitats that apply to KE3A and KE3B as described in the Biodiversity Action Plan are:

a. Ancient and/or Species rich Hedgerows which includes statements that 'they are especially important for butterflies and

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

moths, farmland birds, bats and dormice'. It also says 'hedgerows may also act as wildlife corridors for bats, reptiles and amphibians by enabling dispersal and movement'. I have already demonstrated above the biodiversity richness of this East Keynsham land including the wildlife which Banes state are 'especially important'. Banes have tried in their 'Placemaking Plan' to mitigate their proposals by stating as much of the hedges as possible will be retained. Banes seem to have lost sight of the fact that building development on this biodiversity rich area and the trauma of this development will destroy all that biodiversity including all the 'especially important' wildlife that depend on the area for their existence. The Banes 'Visual and Impact Assessment Study' revealed that the hedgerow fields on KE3A which are in the form of 15th century medieval lynchets cannot be saved. This is also confirmed on the Banes Placemaking Plan concept diagram which shows only a few peripheral hedges being retained on KE3A.

B. Species Rich Grassland which includes a statement that these are 'grassland habitats of high nature conservation interest, which have not been subject to agricultural improvement or intensive management'. The fields on KE3A have been described in the Banes 'Visual and Impact Assessment Study' as 'hedgerow fields in the form of 15th century medieval lynchets and it is very unusual to find fields still in this medieval form today'. I also know that these pastureland fields have not been subjected to pesticides, insecticides or chemical fertilisers. Because of this the grassland fields sustain a lot of wild flora and fauna (See the photograph above). This in turn makes this whole area a biodiversity rich and a self sustaining eco-system. Banes with their development proposals will destroy the very species rich land which they have vowed to protect in the 'Banes Biodiversity Action Plan'. The Banes policy for KE3A and KE3B is in contradiction with the 'UK National Biodiversity Action Plan'.

**Change to the policy requested:**

For all the reasons I have identified in SECTION 7 of this response Banes need to seriously reconsider their proposals to place building developments on the KE3A and KE3B land areas East of Keynsham. In relation to Habitat, Biodiversity and Protected Species legislation Banes should look carefully at all the international and UK legislation including their own 'Wild things Biodiversity Action Plan' before they proceed further with this ill advised development proposal.

Banes should also revisit the Preliminary Ecology Assessment Study which they are using as a key document in support of their KE3A and KE3B development proposals. The document makes an unfounded, unjustified and unsound conclusive impact statement supporting the Banes Core Plan development proposals for KE3A and KE3B. The statement has no place in a preliminary study. This particularly applies when the study itself recognises that a lot more work and further studies are required to eliminate the many unknowns that still exist in relation to the ecology of the KE3A and KE3B land areas. The information and evidence I have provided from local Knowledge of this area should also be taken into account in any further studies.

Note should also be taken of the other two responses I have made to this consultation process in relation to the Banes key documents development proposals for KE3A and KE3B i.e.

- The Transport Access Assessment which has seriously flawed mitigation and is unsound.
- The Visual and Impact Study which has flawed conclusions and omissions.

**Respondent Number:** 3095    **Comment Number:** 4    **Respondent Name:**    **Respondent Organisation:** CPRE Avonside  
**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**Support: 

Land Adjoining East Keynsham

Although this land does not have the national significance of, for example, the Southstoke site, the Green Belt in this location does perform the function of acting as a buffer between Keynsham and Salford, one of the functions of Green Belt as set out in the NPPF. Once sacrificed it could enable further development; development here would also add to the existing heavy traffic on the A4 running through Salford to Bristol and Bath.

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Actions should be taken within the Core Strategy to ensure the future protection of the remaining Green Belt between Saltford and Keynsham, and careful and detailed planning conditions on transport should be set out for any developments on this site.

**Respondent Number:** 3316 **Comment Number:** 1 **Respondent Name:** **Respondent Organisation:** Keynsham Town Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**Support: 

Whilst Keynsham Town Council recognises that until the core strategy is adopted it leaves the whole of B&NES area more vulnerable to inappropriate development, it is clear in its view that the Bristol Green Belt gap and the Green Belt between Keynsham and Saltford should be protected. If B&NES should pursue the inclusion of the two sites proposed for Keynsham the Town Council would request that the following points be taken into consideration.

## 1. Land adjoining East Keynsham – CSA34/35

In respect of point 15 of change reference CSA34, 'Off-site highway capacity improvements required including the A4 and Broadmead roundabout, and Wellsway/Bath Road/Bath Hill junction' Bath & North East Somerset Council Highways Department when considering previous planning application in this area have clearly stated that they will not support a 5 point access on to the Broadmead roundabout. In view of this, the primary access point shown in red on change reference diagram CSA35 would not be feasible.

The access/egress point between Ellsbridge Close and Harding Place shown in red on the concept diagram CSA35 would add to the congestion of peak time traffic in both directions (to Bath/Bristol) and would create a further dangerous junction for residents/visitors turning right from the proposed new development.

In order to potentially reduce, the problems of congestion on the A4 Keynsham Town Council have looked at the proposed potential vehicle access (marked in orange on concept diagram CSA35) leading into Teviot Road and suggest that this be considered as a primary vehicle access.

In respect of point 13 of change reference CSA34, the employment section of the proposed site, located North of the A4 'direct highway access from the employment site to be formed to Pixash Lane' the Town Council wish it to be noted that it is almost impossible to turn right at this junction and to take the A4 West towards Bristol or the Town Centre. Currently, heavy goods vehicles, residents visiting the recycling centre in Pixash Lane and other traffic use Ashmead Road and the Broadmead Lane roundabout as a means of exit from this estate. Introduction of further traffic from employment on this proposed site will increase congestion on the Broadmead roundabout. To reduce, this problem the installation of a roundabout at the junction of Pixash Lane onto the A4 would assist traffic to exit this junction. This roundabout with additional traffic calming measures would slow traffic on the A4 in both directions making egress from the proposed residential development easier.

The Town Council would suggest that a full Strategic Transport Plan is undertaken to answer all infrastructure questions in respect of this site.

In respect of point 11 of change reference CSA34 'Development to fully incorporate SuDs as parts of the green infrastructure strategy .....with wetland habitat provided at in the North West part of the residential site' from local knowledge that Town Council would highlight that the area of proposed residential development is consistently saturated and the land is often waterlogged.

The town of Keynsham is well known for its historical attachment to the both Medieval and Roman times and would request that further archaeological investigations are undertaken in respect of point 10 of the change reference CSA34

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'The Roman road alignments and any surviving remains should be preserved by incorporating it into the development layout.....'

**Change to the policy requested:**

**Respondent Number:** 3494 **Comment Number:** 2 **Respondent Name:** Andrew Wait

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I support developing the land to the north of the A4 and south of the railway.

I support the residential development to the south of the A4 by Wellsway School.

I do support the concept of earmarking land for future development.

**Change to the policy requested:**

**Respondent Number:** 3703 **Comment Number:** 1 **Respondent Name:** Mr Barry Lloyd

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

1. The council should be doing all in its power to PROTECT Green Belt

2. Area to north of A4 – 'Employment'

Pixash Lane at present usually vehicles parked on both sides of the road, making two way traffic problematic at best, particularly when large vehicles are involved. Given this volume of traffic on the A4 vehicles wishing to exit via Pixash Lane will find it difficult to turn left towards Bath, practically IMPOSSIBLE to turn right towards Bristol.

3. Area to south of A4 – 'Residential'

Once again access via the two points off the A4 will just add to the problems of that road. The access point off Teviot Road will involve vehicles travelling via Chandag and Windrush Roads. Windrush Road is a residential road with much parking which already can cause problems for vehicles (it's on a bus route) using it. Chandag Road is very busy at certain times of the day with the school complex and entry or exit via its junction with Bath Road can be very difficult with substantial queues.

**Change to the policy requested:**

Remove this site from the proposals. It is unworkable.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4438 **Comment Number:** 2 **Respondent Name:** Richard Dean**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:** Land adjoining East Keynsham**Comment made on the Proposed Change:**Support: 

The allocation of 200 homes for Whitchurch is too great, with this in mind we would suggest that to enable the council to fulfil its allocation of new homes but mitigate the impact on the village of Whitchurch that the homes allocated for Whitchurch be reduced in favour of an increase in the number of homes suggested for the land adjoining East Keynsham.

The Land adjoining East Keynsham has already been allocated 250 homes with a further area of safeguarded land allocated on the concept diagram in pink. If only a small proportion of this safeguarded land was released now for homes, it would enable easily an increase of a further 100 homes. The position of this land gives excellent position to service both Bristol and Bath and offers many of the services that are lacking in Whitchurch.

The area of land adjoining East Keynsham does have its own congestion problems on the A4 and the loss of green belt is always regrettable, however the position of the proposed development is far better than that which is proposed in Whitchurch. There are both secondary and primary schools within walking distance and further schools and colleges within easy travelling. There is nearby employment with industrial estates, business parks and business centres opposite the proposed land and the proposal to extend employment floor space within the use 'Classes B1 (b) & ©, B2 and B8 north of the A4 as shown on the concept diagram'. There is a superstore within walking distance and the access points to the A4 would offer greater scope for improvement than the Whitchurch development. There is also, to be taken into account, that Keynsham is a town rather than a village and offers many more services and facilities within easy reach of the East Keynsham strategic site.

An extra 100 houses on the East Keynsham site would have far less impact than forcing 200 homes in the village of Whitchurch.

**Change to the policy requested:**

In consideration of my above statement in box 7, I would propose that the number of houses for strategic site allocation land adjoining East Keynsham be increased from 250 to 350 dwellings using land from the safe guarded pink area on the concept diagram.

**Respondent Number:** 4550 **Comment Number:** 2 **Respondent Name:****Respondent Organisation:** Friends of Manor Road Community Woodland**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

We have concerns that the proposed pedestrian and cycle into the northern boundary of the Woodland shown on the concept diagram should be a pedestrian only access in keeping with all the other entrances into the Woodland.

**Change to the policy requested:**

This northern access to the Woodland should be shown as pedestrian only.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4550 **Comment Number:** 1 **Respondent Name:****Respondent Organisation:** Friends of Manor Road Community Woodland**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

My comment relates to the planting of additional trees in Manor Road Community Woodland, in particular in the wild flower meadow known as Plaishets. The Arboricultural Report on this area ignores the fact that this is an award winning wild flower meadow planted by popular demand in 2005 by B&NES and the Friends group. Additional trees will detract from the wildlife diversity of this area.

The Arboricultural Report should have taken into account the history and development of this Community Woodland, including the wild flower meadow, and the great effort put into its establishment and maintenance by the local community.

**Change to the policy requested:**

Reference to additional trees in Manor Community Woodland should be removed. This area is adequately managed by B&NES (Parks and Green Spaces) and the Friends of Manor Road Community Woodland on behalf of local residents.

**Respondent Number:** 4588 **Comment Number:** 3 **Respondent Name:****Respondent Organisation:** Withies Farm Landowners' Group,**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:** Land adjoining East Keynsham**Comment made on the Proposed Change:**Support: 

The amendment is supported insofar as it provides as follows:

- For removal of land from the Green Belt at east Keynsham to provide for residential and employment development with associated infrastructure.
- Rejects Alternative Option KM1 (identified in Annex 3) in favour of Alternative Option KM2 focusing growth east of Keynsham on either side of the A4 to the south of railway line, which is consistent with the Council's evidence base relating to landscape impact and delivering sustainable development that is well integrated with existing communities.

However, objections are sustained to the extent that the removal of land from the Green Belt and the allocation of land for development to the east of Keynsham is insufficient to accommodate development requirements or to deliver the most sustainable form of development.

In previous representations, in particular to change references SPC118-SPC120, objections were raised to the Council's failure to consider the merits of a comprehensive approach to the entire gap between Keynsham and Saltford. The representations were supported by a Development Concept Plan and Brochure to demonstrate the merits of such an approach and how it could deliver sustainable benefits that will not accompany a partial approach. The Council seems to have had little regard for the merits of the approach advocated in the previous representations in its proposals for east Keynsham.

For reasons set out in the previous representations, and substantiated through the supporting information submitted therewith, and through the evidence base which informed the preparation of the Concept Plan and Brochure which has now been uploaded to the Council's web site (CD10/LD3b-e), it is maintained that the land comprising the gap between Keynsham and Saltford, as outlined in red on the submitted Concept Plan, should be removed from the Green Belt and identified for development having a capacity of up to 800 dwellings.

The evidence supporting the Concept Plan confirms the findings of the Council's own assessment that land in the gap between Keynsham and Saltford is some of the least sensitive in visual and landscape terms (CD10/LD3d). It is far less so than the proposed strategic allocation on Land adjoining Weston, Bath (CSA25) which is within the AONB, and also that the subject the proposed strategic allocation at South West Keynsham (CSA37). The latter in part occupies a plateau, and in part land that descends therefrom and away from the built-up area, and which in consequence will encroach into an area that currently has a very rural character being disconnected in physical and visual terms from Keynsham.

The key benefits of land East of Keynsham in landscape terms are several and include:

- the lack of landscape (quality or restraint) designations;
- the moderate landscape condition;
- the good landscape enclosure (that is, absence of elevated terrain);
- its strong relationships with existing urban areas and minimal encroachment into the countryside; and
- the opportunities for the delivery of strategic green infrastructure.

The preliminary Transport Assessment prepared to inform the Concept Plan (CD10/LD3b) confirms that there are no overriding constraints on development of up to 800 dwellings on land to the east of Keynsham, and indeed that it would be more sustainable in transport terms to direct the proposed residential development at South West Keynsham and Whitchurch to East Keynsham instead. It is noted in this respect that the South West Keynsham and Whitchurch sites were categorised as the 'worst performing' locations in the BNES Transport Evaluation (CD9/12/1: Section 4.4.3) together with the West of Keynsham site, which was not taken forward. It is very significant that, unlike either South West Keynsham or Whitchurch, land to the east of Keynsham is in very close proximity to an established employment area, and which the proposed development intends to consolidate. It is therefore well-placed to minimise travel demands through co-location of homes with jobs.

The principal reason for the Council's reluctance to contemplate the merits of a comprehensive approach to the gap between Keynsham and Saltford is understood to be their concern that it would erode the integrity of the Green Belt in terms of its purpose to prevent the coalescence of settlements within the designation. However, as is evident from the Stage 1 Green Belt Review (CD9/E2), this is essentially a 'local' rather than strategic purpose. For reasons set out in representations to the SHLAA and previous representations to the Proposed Changes to the Core Strategy, it is considered that the integrity of the gap between Keynsham and Saltford can not only be preserved, but moreover enhanced, through a comprehensive approach to development.

In the Stage 2 Green Belt Review (CD9/E9) the essentially 'local' purpose of the area of Green Belt in question to 'protect identity and setting of villages' is again acknowledged. However, the overview states as follows:

Maintaining a Keynsham and Saltford Green Belt Gap is identified as desirable within the development concept options report. Providing such a Green Belt gap is also shown to correspond with the maintenance of a buffer zone around the high pressure gas pipeline.

The Conceptual Proposals submitted in conjunction with previous representations to change reference numbers SPC118-SPC120 (inclusive) provide such a Green Belt gap corresponding with the maintenance of the buffer zone around the high pressure gas pipeline.

The current gap between Keynsham and Saltford is no more than an historical legacy of where development had reached on the outer edges of the respective settlements at the time that the Green Belt designation was made. There is nothing significant in Green Belt terms about the width of the gap as it now exists, or 'necessary' for it to be retained in order to effectively maintain the essentially local purpose to maintain separation between the two settlements. Indeed, the clear finding of the Council's own Green Belt review is that it will achieve this essentially local purpose providing the gap corresponds with the buffer zone around the high pressure gas pipeline.

The width of the gap is a poor proxy for its integrity in terms of maintaining separation. The latter is as much about how it is treated and used, and about the perception of separation, robustness and longevity, as it is physical width. The proposals outlined in the respondents' concept plan will provide strong separation through properly managed and maintained green infrastructure in the form of a multi-functional community parkland with appropriate strategic planting corresponding with the pipeline

cordons sanitaires. It will enhance the perception of separation through both the screening effect of strategic planting and the provision of a properly managed and maintained green space with beneficial use and public access extending to the new limits of built development on either side. That is in contrast to the existing situation of unmanaged urban encroachment and under-utilized land beyond the existing developed limits, which gives a semblance of transition and non-permanence.

In addition to enabling the provision of robust and enduring green infrastructure with beneficial public access and use, a comprehensive approach to the gap between Keynsham and Saltford will result in development that is more sustainable and can make a more effective contribution to alleviating existing problems, in particular alleviating traffic on the A4. Only in connection with a comprehensive approach can consideration be given to new dedicated pedestrian/cycle routes connecting the urban areas of Keynsham and Saltford, and a new bus corridor between the two settlements that relieves pressure on the A4. Moreover, given the Council's ambition that the development should provide a new primary school which is likely to serve the needs of both Keynsham and Saltford, the importance of dedicated new pedestrian / cycle connections between the two is accentuated to avoid loading more school traffic onto the A4.

For all of the foregoing reasons, and those set out in previous representations which are already before the Inspector for consideration, it is concluded that a comprehensive approach to the gap between Keynsham and Saltford is the most sustainable, and will not prejudice the maintenance of the separate identities of the two settlements or result in their coalescence.

As raised in previous representations, there is no evidence that the Council has considered and robustly appraised alternative development strategies, and in particular the direction a larger quantum of development to East Keynsham in preference to South West Keynsham and Whitchurch.

In Annex O (Site Appraisals) to the Sustainability Appraisal (CD10/A1/3) it is acknowledged that land at East Keynsham has good accessibility to services / facilities and employment opportunities in Keynsham as well as Bath and Bristol by public transport along the A4 (para. 6). Since the Council is now relying on a BNES-only SHMA, and has rejected any requirement to accommodate housing needs arising from within the neighbouring area of Bristol, there is now little justification for identifying land adjacent to the Bristol boundary at Whitchurch, which would not be a sustainable location for accommodating needs arising from within BNES and is likely to result in greater travel demands than accommodating a larger quantum of development at East Keynsham.

The Council's approach seems to have been to fix on a quantum of development to be accommodated in the strategic locations to be released from the Green Belt, and then to retrofit the Green Belt boundaries to accommodate the relevant quantum. There seems to have been very little assessment of alternative strategies, and in particular the sustainability benefits of a greater Green Belt release at East Keynsham in place of the proposed allocations and Green Belt releases at South West Keynsham and Whitchurch, balancing the Green Belt implications against wider sustainability considerations.

It is clear from the intention to remove 'safeguarded' land from the Green Belt that East Keynsham can accommodate a greater quantum of development without harm to the purposes of the designation. Little, if any, consideration appears to have been given to whether a more comprehensive allocation should be made at the present time in place of allocations in more sensitive and less sustainable locations, in particular, land adjoining Weston, Bath, land at South West Keynsham, and land at Whitchurch. Having regard to all of the foregoing considerations, and those raised in previous representations substantiated through the respondents' Concept Plan and Brochure and supporting evidence base, it is considered that a larger urban extension at East Keynsham is a more sustainable option and development strategy. It should certainly be the preferred option in the event of the Inspector

concluding that the housing requirement during the plan period should be increased.

Removal of land between Keynsham and Saltford from the Green Belt will not prejudice in any way the overriding strategic Green Belt objective to maintain the separation between Bristol and Bath. The secondary, essentially local, objective to protect the separate identities of Keynsham and Saltford can be achieved through a strategic gap policy focused on the gas pipeline cordons sanitaires. This would permit the delivery of planned, robust and enduring outer edges to the developed areas of each settlement, with much stronger connectivity between them, together with the creation of a strong and enduring gap sustained by strategic landscaping and beneficial land-uses that are planned and managed and

will enhance the perception of separation and permanence.

With regard to the Placemaking Principles, as a general comment these would seem to be detailed matters more relevant to the Placemaking Plan rather than a strategic document. As currently worded, they are far too prescriptive, and unsupported by an evidence base to demonstrate that they are feasible and will enable a viable and deliverable development. The following requirements are of particular concern:

- Principle 1: The requirement for an average density of between 40-45 dwellings per hectare is inappropriate. 30-35 dwellings per hectare is the industry norm. There is no reason for a higher density in this instance, and a density of 40-45 hectares would be inappropriate for such an urban edge site that will extend the town into the adjacent undeveloped land. It is noted that the proposed density for the proposed allocation at South West Keynsham is an average of 35 dwellings per hectare, and the proposed density for East Keynsham is higher than any of the other proposed strategic Green Belt sites. There is no justification for a higher density for East Keynsham and a range of 25-35 is more appropriate.
- Principle 2: The requirement to provide up to 30,000 sq m of employment space would not appear to be based on any robust assessment of market demand / requirements, and therefore is of uncertain deliverability in this location. The respondents are prepared to work with the Council to identify what an appropriate requirement might be, but the Core Strategy should not be prescriptive in the absence of an evidence base to support the appropriateness of the quantum identified. Moreover, the definition of employment uses is too narrow. It should allow for all of the 'B' class uses and reflect the wider definition of economic development set out in the NPPF (Annex 2).
- Principle 4: The requirement for development to front the A4 is not understood since the site has limited frontage to the A4.
- Principle 6: The requirement for development to incorporate an element of natural materials is inappropriate and unnecessary.
- Principle 7: In the absence of a comprehensive approach involving all of the land between Keynsham and Saltford, off-site green infrastructure enhancements may not be deliverable or justified. Only in connection with a comprehensive approach will the new green spine coinciding with the cordon sanitaire for the gas pipeline, as identified in the respondents' concept plan submitted previously, be implemented.
- Principle 9: Retention of existing public rights of way may not be practical or appropriate.
- Principles 12 and 13: Direct access to the Chandag Estate, and to the employment site from Pixash Lane, may not be possible and/or appropriate. These are matters to be explored through the evolution of a Masterplan pursuant to Principle 3. The provisions should allow for direct access from the A4 to the employment land to the north.
- Principle 15: Any necessary off-site highway capacity improvements will be determined by the requirements of the development following detailed assessment. They cannot, and should not, be prejudged and prescribed at this stage, and should appropriately have regard to future-proofing to accommodate any requirements arising from further development on the safeguarded land.
- Principle 19: The requirements for new School provision will be determined by existing capacity and the impact of the proposed development on that. Further evidence is required regarding the timing of its delivery, funding arrangements and the sites over which the land-take is to be borne (for example, whether it includes the safeguarded land).
- Principle 20: Reductions in Carbon Dioxide emissions through energy use are best dealt with through Building Regulations, as well as attention to design and orientation.
- Principle 21: BREEAM targets should be aspirational rather than requirements since an onerous requirement that is difficult to achieve in connection with particular developments in particular locations should not frustrate economic development.

Unless and until a detailed masterplanning exercise has been undertaken, with derivation of associated land budget taking into account the Council's requirements for green and community infrastructure, and has been tested in relation to what's achievable and deliverable having regard to land ownerships and viability considerations, any Placemaking Principles should remain generic and aspirational. This is endorsed by the unequivocal advice in paragraph 154 of the NPPF that Local Plans should be "aspirational but realistic". They should not be formalised as detailed policy criteria in a strategic Development Plan Document with which development of a site should comply, with the corollary that failure to achieve compliance could render a proposal contrary to the Development Plan. The evidence base is simply not sufficiently developed to demonstrate that the Placemaking Principles are sound, or that the area of land allocated can physically and viably deliver the development quantum required, at an appropriate density, simultaneously with the green and community infrastructure sought in association with it. This will require flexibility in the quantum of land that is allocated for development.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

The following changes are sought:

- Removal of the land to the east of Keynsham, west of Saltford and south of the railway line from the Green Belt in its entirety and introduction of a 'strategic gap' policy corresponding with the buffer zone for the gas pipeline to maintain the separation between the two settlements;
- In the alternative, retaining land corresponding with the buffer zone for the gas pipeline in the Green Belt and removing land either side of it to the east of Keynsham and west of Saltford from the designation;
- The extent of land to the east of Keynsham and west of Saltford to be retained for the purposes of maintaining separation between the two settlements, either through continued inclusion in the Green Belt or as a new strategic gap policy, to be informed by the Concept Plan previously submitted by the respondents in connection with earlier consultation on the Core Strategy (May 2013).
- Allocation of the entirety of the land removed from the Green Belt to east of Keynsham, west of Saltford and south of the railway for development, to be planned on a comprehensive basis in order to maximise the opportunity for sustainable development, including the delivery of sustainable transport solutions and significant green and other community infrastructure.
- Omission of the detailed Placemaking Principles and replacement with more generic statements of an 'aspirational' rather than 'regulatory' nature, to maintain essential flexibility in devising a viable and deliverable scheme through the detailed masterplanning of the site.

**Respondent Number:** 4715  
**Comment Number:** 1  
**Respondent Name:**  
**Agent ID:** 170 **Agent Name:** C/- BBA Architects Ltd

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**Support: 

In principle my client supports the proposed allocation of land to the east of Keynsham for both residential and commercial development.

Land to the East of Keynsham represents an excellent opportunity to provide for the future projected needs in a sustainable location which is physically well related to the built up area of the town and provides the opportunity to reinforce sustainable transport links with the Town Centre and existing residential and employment areas.

The increase in the projected level of growth is welcomed but it is not considered that it is sufficient to meet the needs of the District to 2026 and further land will need to be released. It will require the development of green field sites, including the further release of land from the green belt, as these represent the most sustainable locations in the District. The land to the east of Keynsham has already been identified as a strategically preferred location for future development and further consideration needs to be given to the extent of green belt land to be released in this location to meet the projected future needs.

National Planning Policy makes it clear that when altering Green Belt boundaries a long term view needs to be taken to ensure that boundaries endure beyond the plan period. The Inspectors previously expressed concerns regarding housing delivery by allocated sites and this has required the removal of land from the Green Belt and revising detailed boundaries through the Core Strategy rather than through the later Place Making Plan. The changes therefore include detailed changes to the inner and outer boundaries of the green belt to accommodate the level of projected growth. The Proposed Changes to the Core Strategy advises that any further detailed changes to the boundaries of the Green Belt will be reviewed in the Place Making Plan but that exceptional circumstances would need to be demonstrated through the review process in order for the detailed boundaries to be changed. It is therefore essential at this stage that the strategic allocations are of sufficient size to accommodate the necessary level of future growth and there is sufficient flexibility to satisfy the required supply of deliverable land.

Policy KE3A anticipates the land providing for residential development of around 250 dwellings at an average density of

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

between 40-45 dwellings per hectare and around 30,000sqm of employment floor space. The NPPF advocates that new development, including housing density should reflect local circumstances and that it is important to plan positively for the achievement of high quality and inclusive design for all developments and that new development should also respond to local character. The suggested density is much higher than existing housing in the locality and in order to protect local character and at the same time accommodate the level of growth anticipated it is likely that more land than currently identified will be required to be released to meet the level of projected need. Further consideration therefore needs to be given at this stage to the extent of land to be released and the detailed boundaries to the green belt which need to be long term and robust. When defining boundaries paragraph 85 of the NPPF advises that local planning authorities should ensure consistency with the local plan strategy for meeting identified requirements for sustainable development, not include land which is unnecessary to keep permanently open; satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period and define boundaries clearly using physical features that are readily recognisable and likely to be permanent.

Although the principle of the development in this location is supported it suggested that the scale of the development and the extent of land to be released be reviewed and extended to include my client's land. The details of his land holding have been forwarded to you previously as part of the public consultation in May 2013. I confirm that the land would be deliverable as defined in the NPPF.

**Change to the policy requested:**

**Respondent Number:** 4803 **Comment Number:** 12 **Respondent Name:** Simon Steel-Perkins **Respondent Organisation:** Waddeton Park Limited  
**Agent ID:** 128 **Agent Name:** Peter Brett Associates  
**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

10. The principle of development on this site is supported, and we agree that the site can be accessed off the Bath Road. However, the extent of the site is being inappropriately limited with artificial constraints and to make use of the full opportunity, to increase the provision of essential affordable housing and to ensure flexibility in delivery, the land identified for development should include further land to the east. It appears that the site north of the A4 is allocated solely for employment uses and we object to this restrictive land use allocation as set out in placemaking principle 2. If the employment allocation is retained it is unlikely to be delivered by the landowner. The site is capable of delivering housing and as such should be recognised for the contribution it could make to the much needed housing land supply that is required. As part of a housing or mixed use allocation, the proper regeneration of the area could be properly achieved.

**Change to the policy requested:**

**Respondent Number:** 4932 **Comment Number:** 1 **Respondent Name:** Reginald Williams **Respondent Organisation:**  
**Agent ID:** **Agent Name:**  
**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

The increase of housing into Green Belt will make the building of a by pass for Saltford starting at the Broadmead roundabout impossible.

All the extra housing on the Bristol – Bath corridor can only increase the traffic through Saltford which is already too high.

**Change to the policy requested:**

Adjust the housing boundaries to allow for a bypass road.

**Respondent Number:** 4937 **Comment Number:** 1 **Respondent Name:** John Aldridge

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**Support: 

It is difficult to understand why the Arboricultural Report contains proposals for Manor Road Community Woodland. Although the woodland is adjacent to the proposed development it is not within it. It is managed by B&NES with support from the Friends Group and has been widely acknowledged for its wildlife and community usage. The report is illustrated by out of date Google earth pictures that do not enhance its authenticity.

**Change to the policy requested:**

Remove suggested changes to the woodland from the Arboricultural Report.

**Respondent Number:** 4959 **Comment Number:** 1 **Respondent Name:** Ms Andrews

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**Support: 

I have lived on Teviot Road for 20 years. I brought my house because of its location – near greenbelt & a good school as well as a quiet neighbourhood with access to an uncongested town with good amenities. Greenbelt should be Greenbelt – in a crowded world congested with traffic, these areas are precious. If we don't protect these areas of beauty & wildlife – deer are regularly seen walking these fields – all we will be left with is concrete.

The area you have proposed is badly thought out. If little concern for your ever diminishing greenbelt was given, even less has been given to the infrastructure, of this scandalous idea. The roads to these estates would not cope with the extra traffic – I invite you to try and get out onto Chandag Road at 8 in the morning & you want to add another 250 cars? Secondly how are the Wellsway schools going to cope? How is Keynsham going to cope?

You have just built an estate at the top of Park Road and want another at Frys. Keynsham is being stretched to its limits. It is becoming impossible to drive into the town because there is too much traffic on the roads and car parks are always full.

Finally I come back to our beloved fields and the Community forest which has been grown & enjoyed by so many – a little area of peace & tranquillity, which you insanely want to build an estate around.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

I hope somebody decent & sane reads are views, before you completely ruin Keynsham & whats left of its Green Belt.

**Change to the policy requested:**

**Respondent Number:** 4959 **Comment Number:** 3 **Respondent Name:** Ms Andrews

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

- Destruction of precious green belt land
- Destruction to wildlife
- These fields flood
- Roads can't cope
- Loss of parking area in Teviot Road
- Affect on schools, other roads already jam packed
- How will Keynsham cope with so many people living in it?
- Crime will increase
- Increased pressure on doctors surgeries, policing, leisure amenities

**Change to the policy requested:**

Leave Green belt land alone.

**Respondent Number:** 4993 **Comment Number:** 5 **Respondent Name:** Susan Jones

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Given the extra amount of traffic that will be using the Chandag Estate, and the current difficulties in exiting the estate, it would seem necessary to improve the junctions of Chandag Road and Bath Road, and Manor Road and Wellsway. Also within the centre of Keynsham attention should be paid to extra parking provision – it is bad enough now. Plus, Pixash Lane is currently almost impassable due to parked cars, so more provision is association with industrial development would be needed.

**Change to the policy requested:**

Add improvements would be needed to Chandag Road/Bath Road junction, and Monar Road/Wellsway junction. More parking provisions are needed in the centre of Keynsham. Parking needs to be addressed in the developments to the North of A4.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 4993 **Comment** 2 **Respondent** Susan Jones  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

The existing hedgerows will be retained and strengthened, which is good. However special attention needs to be taken to the hedgerow between the Community Woodland and the residential development, as currently it is broken in places (unofficially). Action would need to be taken to ensure that access is strictly limited to set places. Currently there is no official access to the Woodland from the fields proposed as residential development.

**Change to the policy requested:**

Add "The hedgerow between the Woodland and Residential Development needs to be strengthened to ensure access is restricted to set places, which currently do not exist.

**Respondent** 4993 **Comment** 4 **Respondent** Susan Jones  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

Assuming the Roman Road is the much overgrown and soggy track running on the edge of the Woodland from Teviot Road, it should remain as an enclosed track (hedges etc on each side) although tidied and the surface made walkable (although not tarmacked or similar). Last time I enquired it was not clear who owned this track – has this been established so that it can be determined whether it is part of the woodland, part of the housing, or a separate entity?

**Change to the policy requested:**

Preserve the track by keeping it within the existing hedges, improving as necessary. If it has not been established who owns it, then this would need investigating.

**Respondent** 4993 **Comment** 1 **Respondent** Susan Jones  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:** Land adjoining East Keynsham**Comment made on the Proposed Change:**Support: 

The provision of woodland and copse planting as an extension to the Manor Road Community Woodland is shown on the map as being to the area designated as a Wild Flower meadow, also to areas that are not currently within the Woodland scheme. These fields may belong to BANES, but should not this section specify that extra land may need to be purchased to provide the Woodland extension?

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

Incorporation of green infrastructure,.....including the provision of woodland and copse planting as an extension to Manor Road Community Woodland, except where areas in the Woodland are designated as non-wooded areas (eg Wild Flower meadows). Additional land may need to be purchased to fulfil this ambition.

**Respondent Number:** 5000 **Comment Number:** 2 **Respondent Name:** Julian F Hanham

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

Support:

Policy KE3A, Change Ref CSA 34 Placemaking Principles:-

The following stated principles are not compatible with the site:-

12 Direct highway access from the residential site to the Chandag Estate for a through bus route because:-

- The existing amenity car park for Teviot Road residents would be severely reduced in size.
- A short cut (rat run) could be produced between the A4 and Wellsway heading south.
- A pedestrian and cycle dominant site, with existing rights of way is not compatible with buses, or any through route for vehicles.
- The provision of a new Primary School is not required, Chandag Junior and Infants schools are abutting the site.
- The use of the existing children's playground and field would be endangered by proposed vehicular road.

**Change to the policy requested:**

Supporting text to amend proposed changes to policy should cover the items listed above and be drafted by BANES' officers.

The changes to the Green Belt to the north of the A4 comply and require no amendments.

**Respondent Number:** 5002 **Comment Number:** 1 **Respondent Name:** Mrs J Abbott

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

Support:

As we live on the side of Napier Road that will be affected by this development, we are very concerned about the impact it will have on our property. We are extremely worried about the springs that will be disturbed when the major digging starts as this could have a detrimental effect on our gardens and foundations of the house including flooding. We have had problems in the past when doing an extension on our house with the difficulties trying to re-route springs. Our road too would be affected by flooding which would cause accidents during winter months due to freezing water. Especially as we are on a bus route. Which also brings up the problem of extra road entrances on Lansdown Lane from these proposed sites. It is already a very busy road, used as a cut through, and I think it could cause major problems with traffic accidents due to the narrowness and steepness of this road.

**Change to the policy requested:**

We strongly object to this whole development as you could be creating more problems in the future for the development itself and ourselves for the sake of placing houses in pockets of land between geological instabilities.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 5020 **Comment** 1 **Respondent** Robert Elcome-Thorpe**Number:****Number:****Name:****Respondent****Organisation:****Agent ID:****Agent Name:****Further Information available in the original comment?** **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:****Support:** 

It would have a huge impact on the local community as the area is one used by many people across Keynsham and Saltford for recreation use, enjoying the public footpaths and bridleways.

If it was to go ahead it would also have an enormous effect on the traffic flow between Bath and Bristol. The A4 is already at bursting point during busy times and, increasingly during the day and at weekends the road is very busy. The traffic from another 250 homes would possibly be the straw that broke the camels back and at busy times the road would grind to a halt.

Alternative access would see car parks removed and large volumes of traffic thrown on to roads which are busy with children going to and coming home from school.

**Change to the policy requested:**

Keep the green belt land as green belt and not develop the housing proposal.

**Respondent** 5030 **Comment** 1 **Respondent** Amanda Ashwell-Fletcher**Number:****Number:****Name:****Respondent****Organisation:****Agent ID:****Agent Name:****Further Information available in the original comment?** **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:****Support:** 

I am writing to log my displeasure at the proposed building of a housing estate off Teviot Road. The area that has been earmarked for building on is such a beautiful location which such an extensive and varied wild life. Once this land is built on it will be lost forever and for that I think it would be a terrible mistake.

I also feel that the roads surrounding this area are already congested enough and with more traffic using the smaller roads it will be nearly impossible to drive anywhere as it will be gridlocked.

This is a hurried email as I have only just found out from a neighbour that consultations with the contactors are starting soon but I felt I must register that I will strongly object to an building in this location.

**Change to the policy requested:****Respondent** 5035 **Comment** 1 **Respondent** Carolyn Day**Number:****Number:****Name:****Respondent****Organisation:****Agent ID:****Agent Name:****Further Information available in the original comment?** **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

I would like to register my objection to the building of a new housing estate on greenbelt on the edge of Keynsham. It is greenbelt and should remain that way. It will mean more traffic for Keynsham and Saltford. The A4 is busy enough without adding to the problem. Keynsham is always busy and with the new shopping centre being built there will be more traffic and more chaos in the high street. Please don't build this new estate and add more problems.

**Change to the policy requested:****Respondent Number:** 5039 **Comment Number:** 1 **Respondent Name:** Veronica Williams**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

I am e mailing to STRONGLY object to the new housing estate planned on GREEN BELT LAND adjoining East Keynsham

1. Green belt land
2. Too many houses being built for a small town
3. Road structure not in place, the traffic is a nightmare in and around Keynsham as it is.
4. Keynsham is advertise as a market town. I don't think so!
5. The usual complaint of schools, doctors, shops, car parks and if the planners do not know all of this by now we have no hope.

Please DO NOT do this.

**Change to the policy requested:****Respondent Number:** 5040 **Comment Number:** 1 **Respondent Name:** Mr & Mrs Clark**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

We live adjacent to the proposed development site and are writing to ask that BANES rethink this particular strategic site allocation

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

The development will overlook our property; this will lead to a loss of privacy and will certainly impact on the peaceful enjoyment of our home and the surrounding greenbelt area – a popular leisure facility used by families, ramblers and dog walkers.

The housing estate will obliterate our views of the Avon Valley and the World Heritage views of Kelston Round Hill – views which are one of the primary reasons for living in our area, reflected in current house values.

The suggestion of a through road via the Teviot Road car park is ridiculous. Not only will alternative parking have to be found for residents of Teviot Road, but it will cause additional noise and pollution which is not a good thing to have right next to the playground where parents currently bring their kids in the knowledge that it is a safe and clean environment for their children to play.

The junction of Chandag Road and Bath Road is already busy and congested being the main artery to the Chandag estate, especially during the school run; this additional concentration of traffic attempting to reach the proposed housing estate together with an increase in roadside parking will cause traffic problems and create a safety hazard for other motorists, but more importantly, the children attending Wellsway & Chandag Schools.

**Change to the policy requested:**

Taking into account the current housing estate being built at The Meadows, together with the huge imminent development of the Somerdale site, we do not see why such beautiful and historic areas of Keynsham such as the East Keynsham fringe should be sacrificed to build even more houses which will eventually merge Keynsham with Saltford – a prospect that neither Keynsham or Saltford residents ever want to see.

Therefore, we ask that BANES reconsider their options and if additional housing really is required on top of the current developments, that they look at less intrusive, safer and perhaps more brownfield sites.

**Respondent Number:** 5042 **Comment Number:** 1 **Respondent Name:** Keith Unsworth

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

I have just heard that you intend to build houses on an area of our green belt adjoining Teviot Road , keynsham. This is a shocking plan which heralds the destruction of the green belt area between keynsham and saltford and is not welcomed or wanted by any of the residents on the southe east side of keynsham. We strongly object to this proposal on the grounds that we will lose much loved open space that has already been protected from further development by issue of a green belt order (which we thought was sacrisanct) and many residents locally use the community woodland for outdoor relaxation and enjoy the open space around the woodland which offers fine views to kelston and the foothills of the cotswolds. The whole idea of this development seems to be against the wishes of the local community and we ask you to reconsider these proposals.

No more masses of small houses please! Keynsham is becoming a concrete jungle with no thought of saving a bit of green belt to enhance all the housing we already have,including other sites to be developed. Let our children play safely in this corner of the housing estate - do not pack this ground with hundreds of more people and dogs turning it into a site for sore eyes" as seen in areas like Twerton and Hartcliffe. We all feel safe, free and happy in this area of Keynsham, everyone looking after their properties and each other. NO MORE CONCRETE PLEASE.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5048 **Comment Number:** 2 **Respondent Name:** Christine Bateman**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

Mindful as one must be of the desperate need for housing and aware of the pressure on Local Councils, not least from the government, I am nevertheless feeling a deep sense of betrayal, that Green Belt Land in this area is being significantly encroached upon. It would of course, be absurd to deny that there is self interest in this protest. Who in their right minds would willingly exchange greenfields and hills, for concrete, street lights and the noise of engines? However, in addition, this land is much loved by people less fortunate, who take daily walks here with or without their dogs. This point is particularly relevant in view of the potential loss of other open spaces around Keynsham.

It is a fact of experience that, once covered with concrete, fields, and the attendant hedges and trees, are lost for ever.

The Planners will, of course, be very aware of all the extra demands on infrastructure, on roads, schools, Social and Public Services: this is their province. May I make a heartfelt plea that, along with the provision of necessary amenities, they will give generous thought to peoples' needs for space, quietness, love of the natural world and wildlife and children's need for freedom.

We have no other recourse than to ask for your re-consideration, or adaptation of the plan to meet these very important needs.

I would be very glad to know what provision for communal parking is to be made, since it would appear that 'primary vehicle access' cuts right through the present parking facility. It is also very unclear that the 'retained hedgerows and trees' will continue to 'screen' the frontage of Teviot Road houses, in the event of the development going ahead. This is of paramount importance and a small 'concession' in return for all that could be taken away. And are we really to have only one tree left to us? Some of us lived through the devastation of elm tree disease some years ago and are very jealous for the preservation of the remaining shrubs and trees, and the bird life they sustain.

The current plan leaves me heartsick. Surely it's not beyond the skill and sensitivity of planners to consider the very real needs of current residents?

Please don't throw this away without due consideration.

**Change to the policy requested:****Respondent Number:** 5049 **Comment Number:** 1 **Respondent Name:** Mr Simon Crutchley**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

Your previous plans all rejected the need for any changes to the green belt so it's hard to see what has changed.

Core Strategy Spatial Options by 11 December 2009

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/SpatialOptions/CSSOLeaflet4-Keynsham.pdf> includes statement

•No further Green Belt development is considered apart from that already allocated in the Local Plan Draft Core Strategy Publication Version December 2010 [http://consultations.bathnes.gov.uk/gf2.ti/f/234434/5072325.1/pdf/-/Draft\\_Core\\_Strategy\\_Summary\\_Leaflet\\_Keynsham.pdf](http://consultations.bathnes.gov.uk/gf2.ti/f/234434/5072325.1/pdf/-/Draft_Core_Strategy_Summary_Leaflet_Keynsham.pdf)

**Maintain Green Belt Boundary**

The previous minimum green belt between Keynsham and Saltford was c926m; the proposed new minimum is less than c570m i.e. a reduction of over one third and hardly a viable break at all. ARUP in their assessment of March 2013 found several issues with regard to planned development

**East Keynsham :Development concept options report - March 2013**

- Keynsham and Saltford are currently separated by a much valued area of open countryside. In order to maintain the separate identities of the settlements and retain the environmental value, it is necessary to leave a significant green corridor and treat this edge in an appropriate manner.
  - East Keynsham is adjacent to the Manor Road Community Woodland which is designated as a Local Nature Reserve. It also includes the Broad Mead Field SNCI and is close to other SNCIs which should be protected from negative impacts.
  - In addition, there is a known Roman site near the Avon Valley Country Park. There is high potential for prehistoric and Roman remains in this immediate area
- Indeed.

The route of the Roman road from Bitton to the Mendip Hills runs through this site. As one of the few undeveloped areas in the vicinity the potential for extremely good preservation of the road and any associated structures or other features is very high.

**Change to the policy requested:**

<b>Respondent Number:</b> 5053	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Mrs Nathalie Coles	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>		<b>Attachments sent with the comment?</b> <input type="checkbox"/>	

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:** Support:

I am writing as a very concerned resident who has just been told by a neighbour that a housing development has been proposed off Teviot Road, Keynsham. Could you please confirm if this is true and if it is why no one in BaNES has consulted the people who will be directly (i.e. public consultation) either through signs on lampposts around Teviot and Cherwell Road etc and/or by writing to the residents concerned; both of which were done in the recent consultation relating to the speed limit challenges in Keynsham. As I understand it you are required to do a public consultation and according to the UK governments online planning and building regulations resource for England and Wales "Once your LPA has received a formal planning application, it will display public notices and/or write to homes and businesses near the proposed site – inviting comments. Most LPAs publish details online too, with larger developments also advertised in local newspapers." This has not happened and as I understand it the consultation finishes on 19th December. As a result of finding out about this proposal I wish to make my objections known

1. This is green belt and as a result should be protected (which is what it was originally designed for).
2. Both Teviot and the surrounding roads are already congested around school times this will only be aggravated by more houses. Our local schools are struggling to cope with demand as it is and another development of 250 homes will have a huge impact on this.
3. There is already a large (K2) development on the other side of Keynsham creating 267 homes and the Cadbury land has a proposed 700 homes both with good access and schools (to be created or extended to support the extra population) this development will need to have the same provided.
4. This land is used by the local community for events and walking dogs etc. This is a vital resource that would be lost.
5. 250 homes is a large amount for this area with very little access in or out of the area. This is a lot of car movement especially for an area that doesn't have a huge amount of amenities. I'm not objecting to houses being built

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however I think a smaller number of houses is more realistic. If 250 homes is built more amenities for local residents will need to be invested including a doctors surgery within a short distance. And the road network would need serious adjustment both in terms of dealing with existing/increased congestion and the safety of the pupils attending the pre-school, infant, junior and senior schools.

**Change to the policy requested:**

**Respondent Number:** 5055 **Comment Number:** 1 **Respondent Name:** Tim House

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The National Planning Policy Framework states that the Government attaches great importance to the Green Belts and its policy is to prevent urban sprawl by keeping land permanently open. Moreover it states that the Green belt serves five purposes:

1. To check the unrestricted sprawl of large built up areas.
2. To prevent neighbouring towns merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

This proposed amendment to the Core Strategy breaches 1, 2, 3 and does not support 5.

The existing public service infrastructure is not adequate to support significant building development. Nor does there appear to be adequate funding for future infrastructure requisite for the size of this build. In these austere times public service budgets are either frozen or shrinking in real terms. No study appears to have been completed to ensure adequate provision of mains water, flood risks, utilities, health, requisite education provision, emergency services, social services and all other service provisions. Therefore it is difficult to reconcile how this build is sustainable, adequate or affordable in the long term to support 250 new dwellings and indeterminate number of people. I am aware that there is potential for Government "New Homes Bonus" and Community Infrastructure Levy start up grants. However, these are one off payments and do not support downstream revenue budgets for ongoing public service provision. It is not clear from your policy where the NHB will be used on infrastructure. There are some limited and speculative comments on potential costs in the strategy. It is not clear if there is a priority clause for local residents in affordable housing.

There is already significant congestion for long periods on the A4 where queues often extend both sides of Saltford to the roundabouts at Newton St Loe and tailback onto the dual carriageway near to the Broadmead roundabout, Keynsham, close to where this development is planned. I am informed that there are already 29,000 car movements on the A4 at Keynsham/Saltford daily. Adding another 500 cars or more and possibly thousands more journeys will exacerbate the existing congestion problems and CO2 emissions. Air quality/pollution by the A4 is already under investigation due to the sheer volume of vehicles at certain times of the day.

Moreover, I am aware of concerns of local residents that if agreed this amended strategy proposal may set a precedent for others to make applications in the future for further building on the greenbelt which in turn will merge Saltford into Keynsham. Green belt should be protected from building without exception.

**Change to the policy requested:**

I have not had the time or resources to consider alternate sites that may be more appropriate to meet the housing needs for BANES over the next 15 years. As with all local authorities BANES is not in control of freedom of movement within the EU. Therefore any external consultation will only predict growth from existing business and population in BANES and no estimates appear to be evidenced within the Core Strategy or Local Plan from elsewhere.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5063 **Comment Number:** 1 **Respondent Name:** Mr R and Mrs S Hatton**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

We are opposed to the proposed planning application likely to be submitted by Mactaggart and Mickel and others to build houses on land between Saltford and Keynsham. The proposed site location is part of the green belt that surrounds Saltford and that needs to be protected. If permission is granted there is a risk of a precedence having been established and more applications will follow until Saltford south and north of the A4 will become another urban sprawl.

I daily exercise my dog across these fields where I regularly see and hear a diverse range of wild life throughout the seasons. Deer are often seen grazing, skylarks can be heard and seen in numbers, hunting barn owls can be seen at dusk not to mention the more common species of birds that nest in the woodland and hedgerows, and fields that are the habitat of smaller mammals, insects and the like. The Wildlife Trust plantation would be isolated under the development proposals and is of insufficient scale to protect our wildlife.

The Environmental Agencies are warning people to expect higher levels of annual rainfall in the future. The locality of the proposed site is prone to flooding. Whilst we may be re-assured by the developers that a modern drainage system will be an integral part of the build, as it is a mandatory requirement, where will the excess water flow? To date the rain water from the greenbelt has naturally run into the roadways and down the storm drains but these fields are still underwater.

The impact on the residents in the immediate vicinity will be immense during and after construction is completed. The noise and air pollution levels will affect every resident in Saltford. New roads to provide access to the proposed sites will cause further disruption on the A4. The volume of traffic using the A4 between Bath and Bristol is already causing concern for residents and the Highways Agency. This development and that of other developments under consideration as part of the B&NES core strategy will exacerbate the problem.

Without an improved infrastructure and only more green belt land will be destroyed to provide that, Saltford services such as they are will not cope. The plans do not make provision for additional community amenities.

Government policy for more housing must be properly managed by B&NES. Destroying green belt around Saltford and Keynsham enabling B&NES to meet its commitment to build homes is really not the solution. The concerns of its current residents who know this countryside and the value of it to future generations must not be ignored. The green belt must not be destroyed here or around Bath. As a an indication of B&NES commitment to Saltford Crest Nicholson and Mactaggart and Mickel must be stopped.

**Change to the policy requested:****Respondent Number:** 5068 **Comment Number:** 1 **Respondent Name:** Ryan Anderson**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

I am writing with regards to some information handed to me by one of my neighbours about the new East Keynsham housing estate.

This is something I would like to oppose, it is an area of natural beauty with great scenic views and would be horrid to see it ruined by rows and rows of houses. I understand that Keynsham is currently in an age of growth but surely there are less pleasant looking areas on the outskirts that can be built on. It is a popular place to walk dogs and for children to play in the summer. There are many wild animals living in the area also such as falcons, owls and deers.

I am appalled that none of us has been informed about this officially and have had to discover it from other residents. I can see why you would like to avoid opposition but is it not within our rights to know what the council is doing on our doorstep.

Please reconsider this proposed plan as you will be ruining a wonderful place to live.

**Change to the policy requested:**

**Respondent Number:** 5073 **Comment Number:** 1 **Respondent Name:** Peter & Debbie Holland

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**Support: 

Introduction

We strongly object to the greenbelt land in East Keynsham being taken away (in the proposed amendments to the Greenbelt as part of the Core Strategy of BANES).

The arguments against it are so strong as to be indisputable.

The residents of East Keynsham in particular and Keynsham in general have an indisputable right of AMENITY with regard to this particular area of greenbelt. The resident's right of amenity, and the council's duty to protect it, far outweighs any pressure on BANES from central government to amend areas of greenbelt for affordable housing.

Rights of Amenity

The rights of amenity for the residents of Keynsham go far further than lovely views, but let's start with this, as it the thing Keynsham people always mention first.

It is often said that "there is no legal right to a view" .....

HOWEVER, there is an important concept called the 'residential amenity of a neighbourhood' which it is the councils duty to uphold - this legal obligation is NO LESS IMPORTANT than their obligation to satisfy the need for affordable housing.

Therefore, it does not mean that the loss of views is irrelevant to strategic core planning.

If loss of a view from a public viewpoint would have a wider impact on a neighbourhood, such matters ought to be taken into account where they are raised.

WE ARE RAISING IT

The 'residential amenity of a neighbourhood' is an extremely important factor in terms of strategic planning (and also

later specific planning permissions).

The amenity of the greenbelt of East Keynsham, however, goes much further than just views because there are many other factors involved - covering the town of Keynsham as a whole, not just the local community of East Keynsham.

We will go onto explain those other vital wider factors below.

But first, the arguments to challenge the amendment of East Keynsham Greenbelt with regard to the 'residential amenity of a neighbourhood' are very strong.

Let's start with the local East Keynsham schools.

If planners and inspectors needed proof of how much importance is set within the community of the greenbelt amenity, then look no further than the local infant's school of East Keynsham.

The Greenbelt is the design for their school logo.

THE CHANDAG SCHOOL LOGO ILLUSTRATES THE LOCATION OF THE SCHOOL SET ON THE EDGE OF THE GREENBELT WITH UNBROKEN VIEWS TO THE DESIGNATED AREA OF OUTSTANDING NATURAL BEAUTY THAT IS THE SOUTH COTSWOLDS AND KELSTON MOUNT

In East Keynsham, as far as the eye can see, there is the unbroken unique aspect of the Avon Valley running through to the designated Area of Outstanding Beauty of the Cotswolds and Kelston Mount. It is pristine, with not even a pylon or telegraph pole in site. This is unique to East Keynsham.

See Photograph 1

The infant school has this scene as their logo on their school uniform. If this isn't sufficient evidence of residential amenity, what is?

Who is the planning officer within BANES who is going to go into the local school and say "Sorry children, but your logo is going to have to change from the green hills, the trees and the birds flying in the sky to one saying 'the concrete cancer has arrived here' - "

Here is a true story from a father of one of the pupils to help illustrate the depth of feeling about this area of greenbelt land being an important and sacrosanct amenity for the residents:-

"A father had lost his job in the recession. He lived in a modest house in East Keynsham a short walk from the school. One rainy day, he went to collect his 6 year old daughter from school. The little girl had been learning about Canada where the teacher said there were big skies and splendid scenery. The girl asked her father "Do we live in Canada?". The father laughed and said "No of course not".

"But we have big skies too look over there" said the little girl. With that the father lifted his head to see the rain had stopped the sun had come out and there was a rainbow. Both stood and looked. The sky was so big they could see where the rainbow came up from the ground on the left and went into the trees on the right. "Look two pots of gold" said the little girl. The landscape was so unique, the rainbow stretched across the whole panorama with Kelston Mount and the Cotswolds as the backdrop in an unbroken landscape of greenery - woods, trees, fields and hills. The father forgot his worry and sadness for a moment and realised that as a father, he was giving his child not riches of money, or computer games or Nike trainers, but riches of unique pristine surroundings, amenity, nature and environment. But he didn't have to live in a rich person's house, he didn't have to move out to an isolated part of the country where she had no friends and could no longer walk to school. She lived next door to the greenbelt. He had chosen a good place for his children to be brought up and, without riches, that is the most a caring father can do. He was proud of that".

If you destroy this man's neighbourhood by destroying the uniquely positioned East Keynsham greenbelt, you destroy him to the core.

School Class Numbers

More prosaic and practical, are the considerations of school numbers with a huge housing estate being built adjacent to

the school. This year (2013) for the Christmas nativity play, the teachers of the junior school had to write parts for the 69 children of Year 6.

69 children in a year group is already stretching the resources to their absolute limit. So with this huge new housing development on greenbelt land, I hope you are thinking about how to solve the problem of already overstretched resources in terms of pupil numbers at the local schools.

#### The Amenity of Car Parking

Chandag road is already a complete mess at school run times.

People use the car park in Teviot Road to do the drop off and pick up.

The residents of Teviot Road and Windrush Green have no off-road parking, so the mess of the three Chandag Road schools is already compromising the parking of the local residents of Teviot Road where parking is already scarce.

Oh, but hang on - don't the proposed plans say the Teviot Road car park is going to be removed for road access to the new housing estate? Where do the planners expect local residents to park? Don't tell me, they are going to concrete up Teviot Park, no doubt.

A parking amenity is one of the most important rights of amenity that exist. But please do not put tarmac in our gorgeous little park to do it.

Other factors of amenity that would be lost by the greenbelt amendments

#### The Dog-Walker's Common Land

We are not dog owners ourselves but we understand the issues for dog owners. A council has an obligation to consider the amenities of the dog owners of Keynsham who make up a large cohort of the electorate.

The area is currently enjoyed by the dog walkers of Keynsham where it is the only place in town they can safely let their dogs safely run in open spaces.

It is on the very edge of town so is easily accessible.

Build a huge housing estate here and you lose the ONLY amenity of this type for Keynsham residents. Responsible owners do not want to let their dogs run in Keynsham Memorial park in the centre of town for obvious health and safety reasons.

There are community woods further into the space to the south east between Keynsham and Saltford, but these spaces much are further away for the non-residents of East Keynsham who travel from the other side of town to exercise their dogs. Dogs running loose in the woods is not ideal for the dogs or the owners. The thicker brush often causes injury to the dogs and it is much more difficult for dog owners to control their dogs.

So woods are not the same thing as open space.

This area of Greenbelt in East Keynsham now constitutes a 'common' right that has been built over the past 20 - 30 years (and more) of land use by the Keynsham residents. We believe this could be argued in law.

Some of the land in question contains several famous, beautiful and historic public rights of way; some of the land is lightly farmed for haymaking, but the combination of the two land uses has meant the land is now effectively a common - and the ONLY common in Keynsham where these facilities exist, barring the woodland further away already mentioned.

WE BELIEVE, RATHER than build on this land it should be protected by the local government as COMMON LAND

If not - where is the 'common land amenity' that the local council are obliged to provide for the people of their town in terms of best practice? Other local councils earmark and protect commons for their residents. Why is Keynsham an

exception?

A large number of the people of Keynsham from all over the town, not just the community of East Keynsham, come to this area of greenbelt land to enjoy it - on a daily basis - for their leisure activities. Whether they need to let their dogs run happily or birdwatch, or just let their kids enjoy nature on the edge of town, or just ramble or 100 other pastimes that occur on this land.

IT IS SHAMEFUL THAT PLANNERS ARE NOW CONSIDERING REMOVING THE ONLY PLACE IN KEYNSHAM where these amenities exist. The town is for the people, not the planners.

The people of Keynsham pay the planners to make better choices than take the East Keynsham greenbelt amenity away from them.

There are 16,000 people in Keynsham, the majority of whom, if properly consulted, would no doubt want the amenity of East Keynsham greenbelt to remain protected.

To destroy this amenity should be made a criminal offence, if it is not already.

Ultimately, if these plans for amending the greenbelt of East Keynsham continue, the residents of Keynsham will begin campaigns on two fronts:-

1. A Legal fight in the courts to make BANES uphold existing vitally important existing amenities
2. A process of peaceful but very well publicised protests including marches, TV interviews and other timey action in order to bring the necessary publicity to this truly appalling part of the core strategy.

Notes to Accompany Photograph 1

Notice in the photo how town and country planners of the past have been so careful not to include even so much as one pylon or telegraph pole in this pristine area. Are we so obtuse and dim-witted in the 21st century not to be able to know the amenity of heritage when we see it?

THIS IS THE ONLY AREA WITHIN KEYNSHAM WHERE THIS UNIQUE ASPECT OF OUR HERITAGE CAN BE SEEN, TOUCHED SMELT AND ENJOYED

SUMMARY

There are indisputable rights of amenity involved not only for the close community of East Keynsham, but also for the rest of the town who regard this area as an extremely important amenity and DO NOT WANT TO SEE A HOUSING ESTATE being put in its place. You may have been getting many emails to this effect, as everyone we speak to feels the same way about the East Keynsham greenbelt amendment proposals. People in Keynsham are angry and up in arms (or will be very soon if not listened to about this). If you haven't received sufficient emails to make objections felt, then the public consultation has failed in that it hasn't been made public enough.

We all hope you are getting the idea by now, that the greenbelt fields of East Keynsham taken up for building without a huge fight

Change to the policy requested:

**Respondent Number:** 5090 **Comment Number:** 1 **Respondent Name:** Nikki, Audrey & Graham Howell

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

We are writing to raise our concerns & objections to the plans to build a new housing estate in the fields near to our homes.

My husband, mother-in-law & I have lived in Keynsham pretty much all of our lives and have always understood that the land proposed for building to be green belt & we are at odds to understand why you now see fit to change the rules!?

The proposed estate is apparently going to have access routes onto the already very busy & congested A4 & another access through the current car park located at the top of Teviot Road. Clearly your planners have not inspected this car park because if they had, they would know that Teviot Road car park is very well used. Parents for the schools use it both mornings & afternoons & residents use it for parking around the clock.

As for the proposal to have a bus route through this access into the Chandag estate, well that is truly beyond a joke! Large buses already travel around Chandag estate & the roads are clearly not suitable for such large vehicles. They are usually carrying just a couple of passengers at best and the proposed route through the Teviot Road car park is obviously not suitable for this purpose.

Also, we are shocked & stunned that the only reason we & our neighbours have found about these silly plans is through chit chat of council member of staff. How is it that we have reached the last day for objections without having received notification directly from the council about something which is clearly going to be close to hearts. Trying to keep unpopular plans quiet is a rather underhand way of doing business! When & where are the planning consultation meetings held & why do you not invite local residents?

Furthermore, the mention of 'future expansion' with regards to a new school suggests that you do not mean to stop here. Will there be any green belt left for future generations to enjoy?

In short, these plans are not well thought out with regards to access, bus routes, loss of valuable parking & changing the green belt & we are most annoyed that no notifications/invitations have been sent out to local residents with regards to meetings etc.

We look forward to hearing from you BEFORE you take these silly plans any further!

**Change to the policy requested:****Respondent** 5091 **Comment** 1 **Respondent** Dave Vickery**Number:****Number:****Name:****Respondent****Organisation:****Agent ID:****Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

I object to this proposal which is encroaching on green belt and protected areas.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5092 **Comment Number:** 1 **Respondent Name:** David & Charlene Fleck**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

We have lived at the above address for 12 years 9months.

We are horrified to have discovered the proposed planning application for the land adjacent to our home, we would like to bring to the attention of the planning department our objections and observations for this proposed project.

The proposal to build on a green belt site !

This proposed site will take away our beautiful views over the fields to the front of our home, also our spectacular views over Kelston Roundhill and the adjoining slopes of the South Cotswolds which is an area of outstanding natural beauty.

This would completely change the visual impact of our neighbourhood and have an adverse effect on the residential amenity of our neighbourhood. We also have real concerns over the impact this development would have over the natural wildlife that inhabits the hedgerows and fields in front of our home i.e. Bullfinches,robins,whitethroats and foxes as well as many other species. As animal owners we are concerned that our public dog walking space will be taken away from us.

Another huge problem is the effect this development will have on the highway safety with all the extra vehicular movements, it will also impact on our residential parking as the proposals will remove much needed parking spaces. We now struggle to park at peak times, evenings and weekends.We have an existing problem with vehicle movements and parking during peak times with the local schools going in and out which impacts adversely on the convenience and safety of other road users. Chandag Road, Windrush Road and Teviot Road will become a rat run for motorists between the A4 and Wellsway and other surrounding roads.

We are somewhat concerned, that as this development directly impacts on us why were we never contacted from the outset ?

We feel that as we were not directly contacted we have been unable to research this project in depth due to the lack of time. Not one of our neighbours knew about this until it was published in the free newspaper last week. It appears you have acted to the letter of the Law but not acted in the spirit of the law by giving those of us most directly affected a fair chance to prepare our comments on this development.

These are real concerns that we have and we hope that the Planning Department will listen and have a full and proper investigation into the impact on our lives and that of our neighbours that this development will have.

**Change to the policy requested:****Respondent Number:** 5095 **Comment Number:** 1 **Respondent Name:** Jackie Moore**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

I have just become a resident to this lovely green belted land that lays right on my back door step.

I really didn't move here to look at yet another housing estate.

I have just been forced out of my lovely 2 bedroomed house, due to the bedroom tax, and thought that I had selected the most amazing area with it beautiful views and walks, and yet less than a month after moving here it appears that you wish to take this lovely, and beautiful heritage away from keynsham, the people, and the wildlife that lives within the boundaries of the grounds that wish to put this estate on.

**Change to the policy requested:****Respondent Number:** 5097 **Comment Number:** 1 **Respondent Name:** Jayne Satterly**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

It has been brought to my attention today, that there are to be new houses built on the land at Teviot Road Keynsham.

I would like my objection to be noted. As a nearby resident I use this area on a daily basis, and am horrified to think we will be losing yet another green belt area.

I have a small dog walking business, and use the fields near to Teviot Road where I enjoy the huge array of wildlife that I see. Slow Worms, Water Vole, Deer Rabbits, Birds of Prey the list is endless. Please consider building this housing estate in an area where people care less about their environment. Sincerely. Mrs J M Satterly. 24 Clyde Avenue.

**Change to the policy requested:****Respondent Number:** 5098 **Comment Number:** 1 **Respondent Name:** Jeannette Cole**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

I understand there are plans afoot to build a new housing estate on the fields in front of Teviot Road, Keynsham towards the A4 road. As a resident of Teviot Road I am writing to object.

Not only are the fields greenbelt which are used daily by dog walkers but Keynsham has already lost much of its greenbelt and there is very little green space between Saltford and Brislington as it is. This is one of the last open pieces of land remaining, with beautiful views of Kelston Mount and I think we must protect this valuable green space.

From a practical viewpoint I do not think this side of town can cope with extra traffic. It is already a nightmare to get out

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of Chandag Road at peak times and the bypass both to Bristol and Bath is heavily queued and at a standstill during an extended rush hour.

More local concerns are that I understand there are plans to put the access road through to the proposed new Estate from our Teviot Road Car Park. This car park is already full each night and there is insufficient roadside parking to accommodate the residents parking as we lose this car park. The car park is also used by parents dropping or collecting their children from Wellsway School.

Teviot Road, its car and the surrounding fields are not only used by immediate residents but people drive over each day to walk their dogs. It is a proper community space enjoyed by many. Please do not allow this proposed building to go ahead.

Change to the policy requested:

**Respondent Number:** 5103 **Comment Number:** 1 **Respondent Name:** Mr & Mrs K Williams

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

We object strongly to this proposal for the following reasons:

- A. It is greenbelt land.
- B. Chandag Road is already an incredibly busy, narrow road which is difficult to navigate at the best of times, and virtually impossible during school start/end times.
- C. Too much demand will be put on Windrush Road and Teviot Road for extra traffic coming to the new development.
- D. Thousands of new houses are already being/due to be built in Keynsham - K2, Cadbury site. We would like to stay an independent town, not merge with Saltford.
- E. Much wildlife and hedgerow would be lost.

Please, please listen to the appeals from residents and make the right decision - it is greenbelt after all. Or does that count for nothing now?

Change to the policy requested:

**Respondent Number:** 5107 **Comment Number:** 1 **Respondent Name:** Pat & Colin Spencer

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

It has come to our notice that there are proposed plans for a new housing estate to be built on green belt in East Keynsham. We are writing to log our objections to yet another development in Keynsham. Enough is enough. We have the development on the Park Road side of Keynsham, then we will be subjected to the development on the Cadburys estate. We know the Government has a policy of building housing stock to assist with the shortfall that has now arisen country-wide but we believe that yet another development will have a huge detrimental impact on Keynsham. There

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have also been smaller developments (ie behind the Grange hotel, opposite St Ladoc Road etc).

The parking in Keynsham is already a problem which we do not believe will be helped greatly when the parking spaces behind the new Civic Centre are fully operational. It's as though the Planning Committee are happy to strangle Keynsham until its people decide they will simply shop elsewhere, unless they want to walk into Keynsham to meet for coffee.

The site of the proposed development is a natural area where children are able to play and people are able to walk. We strongly object to yet more housing developments in and around Keynsham, particularly as this has been designated green belt land. Our understanding is that the Government claim that councils were told that green belt land could only be developed in EXCEPTIONAL CIRCUMSTANCES. Have the Council investigated the use of brown fill sites to meet housing targets?

As we write this we hear on the news that yet more land has been sold on the Charlton Road side of Keynsham with a proposal to build 250 more homes. For goodness sake when is this going to stop. The Keynsham we moved to over 40 years ago is slowly losing all its identity.

**Change to the policy requested:**

**Respondent Number:** 5108 **Comment Number:** 1 **Respondent Name:** Nicola Giblin **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I am writing to object to the planning of a new housing estate next to Teviot park in Keynsham. This wooded area is a beautiful place where many, many people enjoy walking their dogs, horse-riding, walking and running and generally enjoying the countryside. It is a safe place to take our children to walk and learn about the countryside.

So much of Keynsham has been given over to housing now that we are rapidly running out of countryside to protect and enjoy and I would like the planners to consider the countryside we need to leave for the next generation.

**Change to the policy requested:**

**Respondent Number:** 5112 **Comment Number:** 1 **Respondent Name:** Michelle Paddick **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I have just been made aware of the new housing plans adjacent to Teviot Road, Keynsham. How DARE you try and hide this from us all. We have all been tipped off as to your evil plans!!!!

1. The fields have animals in and you will be destroying a lot of the wildlife. Where will they go??
2. I don't want to live in a building site for the couple of years it would take to build

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- 3. How many extra cars??? We barely have enough space for the cars in the area already let alone extra cars for another road coming into our road. Some days I am lucky to get a space outside my own house because of how busy it has got so that should be a problem you should be tackling, not thinking about how to line your f\*\*\*ing pockets!
- 4. Our road is not a main road. It cannot support extra traffic
- 5. Who is paying for this??? Tax payers I am guessing and as a tax payer I do NOT want my money spent on this

To put it bluntly, I do not want to live in a building site and you are all scum and liars!! Our land in Keynsham is beautiful and to destroy the nature and beauty that we have is just disgusting.

PROTECT THE LAND! DO NOT DESTROY IT!!!!

**Change to the policy requested:**

**Respondent Number:** 5118 **Comment Number:** 1 **Respondent Name:** Mr & Mrs M Booth **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

Support:

We have just looked at the above plans as published on your web site.

As a resident of Windrush Road our only real concern is the potential access shown to Chandag estate, for a through bus route, and therefore presumably other traffic as well.

The original part of Windrush Road as you turn into it from Chandag Road is much older, and therefore narrower, than the later extensions, and I guess than for current planning rules. We already have a bus route which regularly has problems getting down this part of Windrush due to parking of cars and buses having to weave in and out. I know several cars have been damaged and fairly often you hear a bus is stuck and the driver is hooting for the owners of parked cars to move them.

To create another through bus route in such a narrow thoroughfare would be disastrous. In addition to this a through route would create a substantial increase in traffic "cutting the corner" to get from Bath Road to Wellsway and become a "rat run".

This would be potentially lethal for the enormous pedestrian traffic of children going to and from the Chandag schools. We are quite amazed that a serious injury/fatality has not happened yet - to our knowledge - not to mention the already horrendous traffic problems twice a day. With the new parking restrictions in Chandag Road, more and more cars are parking elsewhere, particularly in Windrush Road, Cherwell Road, Walden Road and even Teviot Road. This makes even turning into Windrush From Chandag a nightmare as cars are parked right up to the end and it is impossible to see what is coming up Windrush. Additional buses and traffic would cause gridlock, not to mention potential serious accidents involving the hundreds of school children using these roads.

Having looked at the proposals we do not think that the overall plan is bad, with the new primary school ( and presumably increased numbers of children and traffic!) and the pathways/cycle paths and green infrastructure etc, but the increase in traffic and inadequacy of the roads is a serious worry and would ask that this be reconsidered so as to avoid a serious accident occurring.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5119 **Comment Number:** 1 **Respondent Name:** Mrs Madeline Payter**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:****Support:** 

I would like to object strongly to the possible development for housing beyond the eastern edge of Keynsham's present residential area, on precious green belt land next to Teviot Park.

My family and I have lived in Keynsham for almost forty years. My children spent many hours playing in in Teviot Park and exploring the green fields beyond it. They have grown up enjoying the chance to be near beautiful countryside,. This is such an important factor in why Keynsham is a special place to live in.

There must be other locations in the Bath and North East Somerset area which would not be as disadvantageous to the people that live here already, and that would not further desecrate the character of a town which is already seeing so many new houses being built.

**Change to the policy requested:****Respondent Number:** 5126 **Comment Number:** 1 **Respondent Name:** Mr Lee Coles**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:****Support:** 

I am writing as a very concerned resident who has just been told by a neighbour that a housing development has been proposed off Teviot Road, Keynsham. Could you please confirm if this is true and if it is why no one in BaNES has consulted the people who will be directly (i.e. public consultation) either through signs on lampposts around Teviot and Cherwell Road etc and/or by writing to the residents concerned; both of which were done in the recent consultation relating to the speed limit challenges in Keynsham. As I understand it you are required to do a public consultation and according to the UK governments online planning and building regulations resource for England and Wales "Once your LPA has received a formal planning application, it will display public notices and/or write to homes and businesses near the proposed site - inviting comments. Most LPAs publish details online too, with larger developments also advertised in local newspapers." This has not happened and as I understand it the consultation finishes on 19th December. As a result of finding out about this proposal I wish to make my objections known

1. This is green belt and as a result should be protected (which is what it was originally designed for).
2. Both Teviot and the surrounding roads are already congested around school times this will only be aggravated by more houses. Our local schools are struggling to cope with demand as it is and another development of 250 homes will have a huge impact on this.
3. There is already a large (K2) development on the other side of Keynsham creating 267 homes and the Cadbury land has a proposed 700 homes both with good access and schools (to be created or extended to support the extra population) this development will need to have the same provided.
4. This land is used by the local community for events and walking dogs etc. This is a vital resource that would be lost.
5. 250 homes is a large amount for this area with very little access in or out of the area. This is a lot of car movement especially for an area that doesn't have a huge amount of amenities. I'm not objecting to houses being built however I think a smaller number of houses is more realistic. If 250 homes is built more amenities for local residents will need to be invested including a doctors surgery within a short distance. And the road network would need serious

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adjustment both in terms of dealing with existing/increased congestion and the safety of the pupils attending the pre-school, infant, junior and senior schools.

**Change to the policy requested:**

**Respondent Number:** 5134 **Comment Number:** 1 **Respondent Name:** Jutta Coulam

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

By pure accident I found out that there are possible plans for a new housing estate east of Keynsham right on green belt land. Considering there are already plans for housing on the old Cadbury site, Charlton Road and Broadmead Trading estate. How many more houses will there be built before bringing traffic already at walking speed along the Bath Road morning and afternoon to a complete standstill. We moved to Keynsham because it has so much to offer with parks and surrounded by green belt. We like our view of the Avon Valley and Kelston Mount, taking walks through the east Keynsham greenbelt with our grandchildren using the playground to kick a ball, finding peace and quite and treasuring the countryside. Why does every scrap of green be turned into another concrete jungle until we all suffocate from traffic fumes with nowhere to walk other than roaming some housing estate.

Please stop this madness of covering every blade of grass with bricks turning a once beautiful market town where people from far and wide used to come to enjoy the green and pleasurable town into just another extended concrete jungle.

Thank you for sparing the time to read my plea for you to consider not building on greenbelt land on the east side of Keynsham.

**Change to the policy requested:**

**Respondent Number:** 5143 **Comment Number:** 1 **Respondent Name:** Mr Kit Stokes

**Respondent Organisation:** Aspect360 Ltd

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

REJECTED SITE - K28 West of Grange Road  
We strongly object at the cursory process of considering this site.

The site in control of our clients is shown in the summary of the Findings Report on page 3 (under ' ) to have a capacity of around 50 dwellings. The site is located on the south side of the A4 adjoining Saltford and close to the main facilities of the village.

For the purposes of the assessment the Council has included the site is included within the assessment of K28 and K27b on page 22 because it forms part of a much larger site which is mostly under the control of Mactaggart and Mickel.

In response:

- 1) The site is to the south of the A4 and there is no connectivity with the land to the north referred to in K28.
- 2) The land is not within the control of Mactaggart & Mickel
- 3) No gas pipe running through our land
- 4) The council are also making assumptions that the developer will not pass funds to support investing in the A4 to support the additional traffic.
- 5) How do the Council know anything about the costs of developing this land until you have costs and explore this with the developer to see if it is viable.

The Council have not assessed the land as an isolated development area which would be ideal for a modest increase to Saltford. The Council have conjoined the site to an adjoining site which has been submitted which undermines any potential for this site to be developed when in isolation when the site has excellent access and is unconstrained by any pipeline.

The land is not visually prominent and is physically contained within the mature hedgerows that surround the site.

The site in question measures 3.3 hectares and could support approximately 60 dwellings without causing any significant harm to the openness of the Green Belt or the character of the countryside. The land would be contained within the existing hedgerows and is free from significant development constraints.

The site:

- Is in Flood Zone 1
- Contains no Tree Preservation Orders;
- Contains no nature conservation designations
- Has no conservation constraints (Listed Buildings or Conservation Areas)
- Is not visually prominent
- Is within walking distance of the local school and shops
- Is within 5 miles of Bath city centre, 7 miles of Bristol city centre, 2.0 miles of Keynesham Town Centre and less than 0.5 miles of Saltford village centre and local primary schools.

A further factor to consider is the deliverability of development. 60 dwellings on a site of this scale could be delivered immediately without requiring significant infrastructure. The same cannot be said for land to the east/north of Keynesham which lies upon significant infrastructure provision. The reliance on major urban extensions to provide a substantial number of homes will not deliver the required number of new homes at an early stage in the Local Plan. Additional smaller sites for housing should be allocated as alternatives to ensure sufficient choice and flexibility for new development in this area.

As the attached annotated plan demonstrates, the allocation of the land on the north-western edge of Saltford will enable the strategic Green Belt gap between Keynesham and Saltford to be retained.

There will be no adverse impact on the main reasons for including land in the Green Belt . Neighbouring towns will not merging into one another.

- Encroachment into the countryside will be significantly less than if the large urban extensions are provided;
- The setting and special character of historic towns will not be impacted;
- The proposal will have a neutral impact on urban regeneration when compared with the large urban extension of Keynesham.

**Change to the policy requested:**

That land at Saltford is allocated for development of 50 houses and the development at Keynesham is restricted in size. This will allow some organic growth at Saltford.

A larger number of more modest developments would be more likely to be realised in the short term rather than being landbanked by a larger developer.

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**Respondent Number:** 5143 **Comment Number:** 2 **Respondent Name:** Aspect360 Ltd

**Agent ID:** **Agent Name:**

**Respondent Organisation:** Aspect360 Ltd

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**Support: 

The BANES Green Belt Review identifies that the development of all of these areas for urban extension would prejudice the openness of the Green Belt and the purposes of including land within the Green Belt. We do not disagree with this summary but would contend that the approach of only providing the large urban extensions proposed would be more harmful to the character of the countryside and the openness of the Green Belt than the development of smaller parcels of land which adjoin and infill the fringe areas of towns and villages which would enable urban areas to be contained but the critical mass of residential units to be achieved.

In particular development to the East and South-west of Keynsham would result in a much larger urban area that would threaten the very character of the settlement and cause substantial urban sprawl. This proposed area of extension should be reduced with some development allocated on the land to the north-west of Saltford as shown on the attached plan.

The proposal to extend the urban area of Keynsham to the east should be reconsidered for the following reasons:- A smaller amount of development would be better located on the area to the west of Salford as annotated on the attached plan .

This land is immediately available for development, has excellent access along the Bath Road A4 corridor where there is an established public transport network and a strategic cycle path. Primary schools, shops.

**Change to the policy requested:**

That land at Saltford is allocated for development of 50 houses and the development at Keynsham is restricted in size. This will allow some organic growth at Saltford.

A larger number of more modest developments would be more likely to be realised in the short term rather than being landbanked by a larger developer

**Respondent Number:** 5145 **Comment Number:** 1 **Respondent Name:** Paul Trueman

**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**Support: 

As the season of goodwill approaches writing this letter was not a welcome Christmas present. Considering the proximity of yet another sizable development to an existing large population that will be affected which will:

Place a greater strain on the existing infra-structures and services. Roads already barely cope at rush hour, further deterioration caused by the ridiculous 20mph speed limit in Keynsham and the amount of traffic along the A4. Traffic from the proposed estates onto the A4 will have great difficulty joining and leaving it. Most of Manor Road is only a country lane. This strain will increase when B&NES personnel move into the centre;

A decrease in life-sustaining vegetation and a permanent increase in environmental pollution from general human activity and traffic, which is worse during any construction, as evidenced by those living close to K2;

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Show the lack of consideration of the impact on the existing communities of Keynsham and Saltford, eg general health and wellbeing, education and transportation;

Grossly reduce one of the few perks of living in East Keynsham, ie the aesthetic view towards Kelston Roundhill;

The removal of irreplaceable green belt- which helps give Keynsham a distinctive community atmosphere . People live here because they don't want to live in a heavily built-up area like Bristol, or Bath and certainly not as an integrated suburb of both;

The existing Keynsham K2, town centre developments and recently increased facilities in Memorial Park have already reduced the amount of open green space and the Somerdale development will reduce it further, adding to the existing infra-structure problems;

The lack of consideration of Keynsham as an historic market town;

The Teviot Road play area will lose the relaxing atmosphere induced by mainly natural surroundings, feel claustrophobic and be subject to noise pollution, and won't cope with increased usage, especially as there's no facilities for teenagers;

The lack of shops and other facilities, particularly as parking is limited at those in Chandag Road and Saltford;

The lack of regional integration- the proposed Kingswood development and others in Bristol, NE Somerset, S. Gloucestershire, Bath and rest of B&NES shows a blatant disregard for the whole area and again the wellbeing of their existing populations by the local authorities;

The agricultural land adjacent to Teviot Road was sold to property developers several years ago without any notice or consultation. This verges on the immoral as it smacks of a "done deal" in a supposedly democratic society where people are supposed to be consulted before such matters are even instigated;

My young teenage daughter (a future voter) says that she would like to see the land of her childhood kept unspoilt;

In short, the use of surrounding land should not be changed, but further safeguarded for the use of future generations of the Keynsham, Saltford, and nearby Bristol and Bath to help appreciate the environment they live in, especially as much space has been recently lost.

**Change to the policy requested:**

**Respondent Number:** 5146 **Comment Number:** 1 **Respondent Name:** M Pugh

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I wish to lodge my objection to the proposed site of building development on the greenbelt – REF CSA 35 & REF CSA 36.

I only recently moved to TEVIOT ROAD (in July 2013) A major part of my decision to accept the flat was the fields and woodlands at the back ( I overlook the field). I love walking in the fields and woods, I also hope to see the deer that I am told sometimes visit them.

My grandchildren love coming to visit and stay, as they can romp in the fields and explore the woods (they also love

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feeding carrots to the horses.)

I hope this letter is taken into account when the decision is made.

**Change to the policy requested:**

**Respondent Number:** 5147 **Comment Number:** 1 **Respondent Name:** J. W. Allen

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I refer to the proposed development for a new housing estate in East Keynsham off TEVIOT Road and wish to propose that this development is NOT completed and planning permission is withdrawn for the following reasons:-

- There will an increase in traffic in the area which is already under considerable restraint during 08.00-10.00 & 14.45-16-30 during weekdays, It can sometimes take at least 30 minutes to gain access into Keynsham whichever route is used from Walden Road. There is an encroachment upon the GREENBELT
- An increase in the RISKS for young members of the local community due to an increase in traffic.
- Lack of local support facilities within the Keynsham area to support an increase in population.
- Increase in noise effecting a peaceful area which was chosen for its seclusion
- Encroachment of freedom of movement and access to open fields for pleasure & relaxing.
- There is also a large development planned for the FRY's AREA of Keynsham

**Change to the policy requested:**

**Respondent Number:** 5148 **Comment Number:** 1 **Respondent Name:** Mr D W Rogers & Mrs J Rogers

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

We object strongly to the new housing & new road development in our area of green belt location.

This would have a devastation effect on our area with increase traffic.

I hope other sites would be considered & not in our area of outstanding beauty.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5169 **Comment Number:** 1 **Respondent Name:** Mr Geoff Dunford**Respondent Organisation:** The River Regeneration Trust**Agent ID:** 26 **Agent Name:** Built4Life**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA33 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

CSA32 refers to Policy KE3A which identifies land south of the railway line that is the Preferred Strategic Site allocation for East Keynsham. It identifies the site allocated for residential and employment development in East Keynsham including a revised detailed Green Belt boundary and the place-making principles to be met by development. In identifying the preferred site KE3A, other sites such as KM1 were considered through the Sustainability Appraisal process as is required of Act, Policy and Government Guidance including the National Planning Policy Framework. As B&NES states, "The appraisal has informed the identification of the strategic site allocations subject to this consultation. It includes an appraisal of the strategic sites considered and those not being taken forward."

We believe that KM1 and not KE3A should be the Preferred Strategic Site allocation that is taken forward. We also believe that KM1 was not given a fair consideration in the revised Sustainability Appraisal nor the East Keynsham Sustainability Appraisal Matrix; given the evidence base available to the B&NES Planning Team and its Consultants. The River Regeneration Trust had two lengthy meetings with the B&NES Planning Team (30th September & 21st October 2013) and provided them with documents, proposals and three development options using CityCAD to help inform their review of the Sustainability Appraisal for East Keynsham, and ultimately their selection of preferred site(s) and lands to be released from Green Belt or safeguarded for future development. Just so that you are clear and understand the situation:

A - "The purpose of sustainability appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of revisions of Regional Spatial Strategies (RSS) and for new or revised Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs)." Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (Paragraph 1.1)

B - "Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular, they should carefully consider the inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development." Planning Policy Statement 1: Delivering Sustainable Development (paragraph 24)

C - "...sustainability appraisal is mandatory for RSS revisions and for new or revised DPDs and SPDs [Supplementary Planning Documents]." Planning and Compulsory Purchase Act 2004 (Section 39(2))

D - "The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles..... These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solution." National Planning Policy Framework (Paragraphs 6, 7 (part) & 8))

It is our understanding that A, B and C above help to ensure delivery of D and that Sustainability Appraisal is the vehicle for deciding options and site allocations because it aggregates the key social, economic and environmental items into one appraisal – Revised Sustainability Appraisal Matrix for Keynsham East, November 2013 (attached).

It is of our opinion and based on the evidence before us, that B&NES Planners have not included in their review of the Sustainability Appraisal for East Keynsham the evidence submitted to them on the following dates:

1. Avon Valley Farm Access Map, also submitted during the Core Strategy Schedule of Changes Hearing in May 2013

2. Availability and Deliverability of Housing in A1-A3 report on 22nd September 2013
3. Overall and Phase 1 summaries for each of Options A-C including Job number calculations hand-delivered during the meeting on 21st October 2013
4. Sections of the Draft Broadmead Peninsula Scoping Study (Executive Summary, Transport section, Green belt extract and Circular Economy extract) on 30th October 2013

They may argue that some of this was too late for the review, but we know that they considered information from documents submitted to them in October and possibly November (transport access statement), so there is little excuse for not including 1-4 above, given that they were requested by and issued to B&NES Planning Team. They may also argue that two Sustainability Indicators, access to site and landscape impact, were their main reasons for 'rejecting' KM1; both of which are being resolved in our ongoing plans and proposals.

It is also our understanding that B&NES Planners are using the Sustainability Appraisal for Keynsham East to justify allocation of Strategic Sites to be released from Green Belt and Safeguard land for future development now, and not during the Placemaking Plan as was their initial intention. This is not allowing sufficient time for proper consideration and due process. Similarly, that this is a one chance only to get land released from Green Belt or Safeguarded up to 2029 and that no matter how many 'reviews' are undertaken in 2016 or thereafter, 'inappropriate development' (e.g. allocated affordable housing, houseboats for boat dwellers, homes for alternative lifestyles, retirement homes and build-to-rent homes) will not be permitted in the Green Belt.

The River Regeneration Trust (formerly the River Corridor Group) and Built4Life (initial Agent of Avon Valley Farm and Broadmead Properties) have continued to positively engage with the Core Strategy hearings and the B&NES Planning Team for almost four years. Both The River Regeneration Trust and Built4Life have delivered a number of public engagement exercises, published reports, and promoted their ideas on Broadmead Peninsula to Cabinet, Council and Officers on a number of occasions. We have delivered presentations to the people of Keynsham on two occasions at The Cadbury Club and Keynsham Town Council, we have been positively published in The Week in and Keynsham Matters and shown our ideas at St Michael Church and during Bath City Week. We have constantly engaged with the community and involved them with our ideas for years, as is expected by the Neighbourhood Planning Protocol. Our proposal in KM1 is to create at least 500 new, permanent full time jobs from manufacturing to market gardens, we will build an array of private and affordable homes to suit a range of lifestyles and embed teaching and learning about our hydrological world and environment through a marina, constructed wetland, water ecology park and early learning aquatic centre. It does not encroach upon the Green Belt gap between Saltford and Keynsham, as the current preferred site does. KM1 is far more sustainable and respectful of Green Belt than other sites being considered.

All that we ask is that our proposals for Broadmead Peninsula and KM1 are given a fair and considered hearing through a Sustainability Appraisal that utilises the evidence base, then let the Placemaking process decide the Preferred Strategic Site allocation for East Keynsham. Without this, we believe that the Core Strategy is Unsound, as the consideration and allocation of a Strategic Site allocation in East Keynsham has not been positively prepared using the evidence base available, nor taken account of the added value Broadmead Peninsula would bring to delivering items in the Infrastructure Delivery Programme and facilitation of the Environment Park on Broadmead landfill Site as identified in the West of England Joint Waste Core Strategy. This was clearly defined in:

1. Availability and Deliverability of Housing in A1-A3 report on 22nd September 2013
2. Overall and Phase 1 summaries for each of Options A-C including Job number calculations hand-delivered during the meeting on 21st October 2013
3. Sections of the Draft Broadmead Peninsula Scoping Study (Executive Summary, Transport section, Green belt extract and Circular Economy extract) on 30th October 2013
4. Avon Valley Farm Access Map, also submitted during the Core Strategy Schedule of Changes Hearing in May 2013
5. East Keynsham Sustainability Appraisal Matrix

**Change to the policy requested:**

Land adjoining East Keynsham (North of railway line) on the Broadmead Peninsula which is currently alternative option KM1, should be identified as the Preferred Strategic Site allocation for East Keynsham and not KE3A. This would be defined by a fair and considered Sustainability Appraisal of the evidence base. This would demonstrate that the Preferred Strategic Site allocation for East Keynsham was the most sustainable location for release of Green Belt and safeguarding land for future development.

It would also demonstrate soundness in that due and proper consideration was given to actual new employment numbers

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and not employment floorspace, that agricultural land released from Green Belt or safeguarded was in the best interest of people, nature and food security, and that affordable and allocated homes for key workers, boat dwellers and alternative lifestyles were justly considered. These are all key items of the Broadmead Peninsula Scoping Study which is available on the B&NES Core Strategy list of documents.

**Respondent Number:** 5170 **Comment Number:** 3 **Respondent Name:** Mr Cunningham

**Respondent Organisation:** Alder King Planning Consultants

**Agent ID:** 195 **Agent Name:** Alder King Planning Consultants

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA33 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

3.3 It is also considered that the 'Placemaking Principles' are overly prescriptive and should be re-worded to establish strategic placemaking principles. Detailed principles should be established in Supplementary Planning Documents which should be read in conjunction with parent policy. Such an approach would avoid the potential policy conflicts alluded to in the supporting text.

**Change to the policy requested:**

3.4 Having regard to the above and the fact that Local Development Documents should maintain conformity with each other, it is considered that the supporting text should be amended as followed:

The strategic requirements that need to be met to enable development are set out in the Placemaking Principles, Core Policies and indicated on the Concept Diagram. Detailed site specific Placemaking Principles will be established in Supplementary Planning Documents.

## Change Reference: CSA34 Land adjoining East Keynsham

**Respondent Number:** 180 **Comment Number:** 9 **Respondent Name:**

**Respondent Organisation:** J S Bloor Ltd

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA34 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

An objection is made to Policy KE3B safeguarded land at East Keynsham, which is unsound as it is not justified.

See earlier representations on CSA 32.

The Council only identify land at East Keynsham to be safeguarded. The Council have indicated in some areas that the safeguarding issue will be addressed in a review of the Core Strategy, however there is no certainty over the timing of this review i.e. when it will be undertaken, particularly as the Council indicate that the first review will be timed to enable co-ordination with the review of the core strategies of adjoining authorities in the West of England. Whilst the Duty to Co-operate appears as a standing item on the West of England Planning Housing and Communities Board agenda, there is no commitment to any timetable for the review of Core Strategies and much will depend on the outcomes of the Joint SHMA which has been commissioned, but it is not expected to report until autumn 2014, and even then these will only be draft findings.

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In respect of East Keynsham which seems to be the only area identified where land can be safeguarded, it is noted in Annex O that Area A is accessible to employment opportunities it is relatively remote from the town centre of Keynsham and to the north of the railway line and also the A4 and therefore without easy access to the existing community facilities and locate services by means of transport other than the private car, and has limited connections to neighbouring residential areas. The appraisal indicates that there are potential benefits of a vehicular linkage between the A4 and A4175 from the north of the railway line and there is potential for longer term transport improvements but the deliverability of these improvements is uncertain also the funding.

The area of land that is proposed to be safeguarded is to the south of the railway line and the A4 but it is considered that this would lead to coalescence issues with Saltford (Area C1), could also increase propensity for commuting given proximity to AR corridor and therefore Bath and Bristol. There is no capacity to expand the primary school and consequently a new primary school would be required, but this is still assessed as a positive. There is no justification for safeguarding this area is provided in Annex O.

**Change to the policy requested:**

Policy KE3b should be deleted as it cannot be justified.

The issue of safeguarding land should be revisited, the plan fails to address this in a comprehensive manner as it concludes that only land to the east of Keynsham can be safeguarded, but even this is flawed as there is no convincing evidence that transport capacity limits can be overcome and the area has been recognised as being a highly sensitive part of the Green Belt being the critical gap between Saltford and Keynsham. It is unsound to defer the issue of safeguarding land to a review of the Core Strategy, particularly given the debate on at the Hearing Session on the overall housing requirement; the proposed amendments provide no flexibility in terms of accommodating higher levels of housing provision.

**Respondent Number:** 239 **Comment Number:** 1 **Respondent Name:** Keynsham Civic Society

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA34 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

KCS objects to:

- The Safeguarded Land (pink area) behind Minsmere Road.
- The term 'Safeguarded' is misleading. It implies some kind of protection or limitation, the words "identified area for future development" makes it clear. Please can this amendment be made?
- The absence of a buffer zone at the southern end of the eastern pink area.

**Change to the policy requested:**

Removal of the pink area behind Minsmere Road; ie. It should remain as Green Belt

**Respondent Number:** 2564 **Comment Number:** 25 **Respondent Name:**

**Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA34 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

11. The plan and amendments are identifying only very limited amounts of safeguarded land for development beyond the

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

plan period, and these areas do not go far enough to ensure the green belt boundary will not need to be altered at the end of the development plan period. The NPPF makes clear that when defining green belt boundaries authorities should 'identify safeguarded land in order to meet the longer-term development needs stretching well beyond the plan period'. There is further land to the east of Keynsham within the area of search which does not serve a green belt purpose. This land is entirely suitable for development and should be removed from the greenbelt and either allocated for housing if required by an accurate assessment of objectively assessed need, or identified as safeguarded land for longer term development.

**Change to the policy requested:**

**Respondent Number:** 3017 **Comment Number:** 2 **Respondent Name:** Mr Anthony Orley **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA34 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

See comment for CSA33

**Change to the policy requested:**

See Change Sought for CSA33

**Respondent Number:** 3017 **Comment Number:** 4 **Respondent Name:** Mr Anthony Orley **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA34 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

See comment for CSA33

**Change to the policy requested:**

See Change Sought for CSA33

**Respondent Number:** 3017 **Comment Number:** 6 **Respondent Name:** Mr Anthony Orley **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA34 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

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See comment for CSA33

**Change to the policy requested:**

See Change Sought for CSA33

**Respondent Number:** 3494 **Comment Number:** 3 **Respondent Name:** Andrew Wait**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA34 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

However, I do not support the further development of the “pink land” area to the south of the A4 after the duration of this Core Strategy as I consider this to be over development in a crowded residential area with few facilities. I would prefer to earmark land to the north of the railway line in the Avon Valley Farm area.

**Change to the policy requested:**

I would like to see the proposed pink area development removed from the plan.

**Respondent Number:** 4588 **Comment Number:** 4 **Respondent Name:****Respondent Organisation:** Withies Farm Landowners’ Group,**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA34 Land adjoining East Keynsham**Location:** Land adjoining East Keynsham**Comment made on the Proposed Change:**Support: 

The change is supported to the extent that additional land to the east of Keynsham that is deemed not to be required for development during Plan period, is proposed to be removed from the Green Belt and safeguarded for future development requirements. Indeed, in submissions to previous changes (May 2013 – refs: SPC19 and SPC24), the respondents advocated the adjustment of Green Belt boundaries to allow for more than immediate development requirements.

However, for reasons set out in submissions relating to CSA33, the respondents do not consider that the Green Belt boundary has been adjusted to remove sufficient land from the designation, or that sufficient land has been identified east of Keynsham and west of Saltford to accommodate requirements during the plan period and to maximise the opportunity for sustainable development that this location represents.

In the event that the Inspector accepts that land either side of the gas pipeline buffer zone should be removed from the Green Belt, then to the extent, if any, that he finds that the removed land is not required for development during the Plan period, it should be identified as safeguarded land.

It is significant that the only safeguarded land identified in the Plan is that to the east of Keynsham the subject of proposed new Policy KE3B. This confirms the constraints on identifying suitable development land beyond the Plan period and the need to maximise potential opportunities that are available in sustainable locations and that can be developed without harm to the important landscape and heritage assets. Indeed, it is confirmed in para. 6.63A introduced through change ref: CSA50, that there is no scope to identify safeguarded land at Weston, Odd Down or south west Keynsham. This confirms that, in the event of the housing requirement being increased during the plan period, and/or identified sites

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not delivering as anticipated, there are very few contingencies available for remedying any delivery problems.

The clear guidance in para. 83 of the NPPF is that, in altering Green Belt boundaries, “authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”. That approach does not appear to have been followed in this instance. The need to remove land from the Green Belt to accommodate development requirements during the current plan period reflects the fact there are very few development opportunities within the existing limits of the District’s main settlements, and that their existing limits are tightly surrounded by Green Belt. That situation is unlikely to change beyond the current plan period, meaning that further Green Belt land will be required in order to accommodate future development requirements. The safeguarded land currently identified to the east of Keynham is unlikely to be sufficient to accommodate development requirements in the longer term, and for reasons set out in other representations, may well be required during the current plan period, and/or in the short term following review of the Core Strategy in the light of the new West of England SHMA. As a generality, it is therefore considered that the safeguarded land identified in the Plan is insufficient to meet longer term, or even short term, development requirements, and therefore fails to comply with the NPPF requirement to set Green Belt boundaries that are capable of enduring beyond the Plan period.

Land between Keynsham and Saltford is therefore one of the least constrained, and most sustainable, opportunities, and one of the few options for accommodating contingencies and/or future requirements for development land (short or longer term). It is therefore essential to maximise the opportunity, which supports the case for removing the entirety of the land south of the railway from the designation now.

To the extent that it is not required for development during the plan period (and having regard to the benefits of planning for its development on a comprehensive basis set out in representations to CSA33), it should be identified as safeguarded land.

The reference to planning permission only being granted when it is proposed for development following a review of the Local Plan after 2029, should be removed. The only reference should be to the safeguarded land being removed from the Green Belt to accommodate future development requirements. Those requirements may arise prior to 2029 in the event of delivery failures elsewhere and/or additional requirements for development being identified prior to 2029. In view of the evident lack of alternative options for accommodating future development requirements, there is a distinct possibility of safeguarded land being required in advance of 2029.

### Change to the policy requested:

The following changes are sought:

- Amendment of the safeguarded land to reflect any amendments made in response to CSA33 in terms of allocation of additional land east of Keynsham for development during the Plan period and/or removal of additional land from the Green Belt and it not being required for development during the plan period.
- Amendment of the policy wording to allow for the land to be brought forward for development once there is an identified requirement for the release of additional land.
- Consequential amendment of the definition of ‘safeguarded land’ in the Glossary.

**Respondent Number:** 4803 **Comment Number:** 13 **Respondent Name:** Simon Steel-Perkins

**Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA34 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

### Comment made on the Proposed Change:

Support:

11. The plan and amendments are identifying only very limited amounts of safeguarded land for development beyond the plan period, and these areas do not go far enough to ensure the green belt boundary will not need to be altered at the end of the development plan period. The NPPF makes clear that when defining green belt boundaries authorities should ‘identify safeguarded land in order to meet the longer-term development needs stretching well beyond the plan period’. There is further land to the east of Keynsham within the area of search which does not serve a green belt purpose. This

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land is entirely suitable for development and should be removed from the greenbelt and either allocated for housing if required by an accurate assessment of objectively assessed need, or identified as safeguarded land for longer term development.

Change to the policy requested:

**Change Reference: CSA35 Land adjoining East Keynsham**

**Respondent Number:** 50    **Comment Number:** 1    **Respondent Name:**    **Respondent Organisation:** Saltford Parish Council

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA35 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

Support:

Saltford Parish Council notes that the draft Core Strategy has been amended to enable an increase of around 10,350 jobs and 12,960 homes in the B&NES area during the period of the plan. We understand that these figures are now based on the latest Census data and projections for growth.

Saltford Parish Council welcomes the maintenance of the existing housing development boundary at Saltford and the protection of the Green Belt surrounding the village which are considered vital for preserving the identity and character of Saltford.

The main A4 road at Saltford suffers from long traffic queues at peak times, creating access problems for residents and pollution levels in excess of targets. Saltford Parish Council wishes that any housing and industrial development at Keynsham or on the outskirts of Bath be planned with a view to reducing Saltford's traffic volumes and flow. Policies should be adopted at these proposed housing and industrial development sites that encourage vehicles away from the A4 corridor through Saltford and include the promotion of sustainable, public transport solutions.

We are concerned that the current proposal shows no progress in this direction.

Change to the policy requested:

Please see comment in 7 above

**Respondent Number:** 239    **Comment Number:** 2    **Respondent Name:** Keynsham Civic Society

**Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA35 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

Support:

KCS objects to:

- The proposed area of housing extending to the boundary of Manor Road Community Woodland without a buffer;
- The proposed link into Teviot Road

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- To safeguard the integrity of the Community Woodland and remaining Green Belt.
- A significant buffer zone between any development (now being proposed or identified for future development) and the Community Woodland;
- No development or road access between the proposed residential development and Teviot Road.

**Respondent Number:** 239    **Comment Number:** 4    **Respondent Name:** Keynsham Civic Society

**Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA35 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

**Change to the policy requested:**

- A significant buffer zone between any development (now being proposed or identified for future development) and the Community Woodland;
- No development or road access between the proposed residential development and Teviot Road.
- Removal of the pink area behind Minsmere Road; ie. It should remain as Green Belt;

**Respondent Number:** 2564    **Comment Number:** 26    **Respondent Name:**

**Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128    **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA35 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

12. The concept diagram fails to include residential development on the land to the north of the A4 and as such need to be amended to reflect the ability to deliver residential development on the site.

**Change to the policy requested:**

**Respondent Number:** 4588    **Comment Number:** 5    **Respondent Name:**

**Respondent Organisation:** Withies Farm Landowners' Group,

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA35 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

For reasons set out in response to CSA33 and CSA34, it is the respondents' view that additional land should be removed from the Green Belt to the south of the railway, east of Keynsham and west of Saltford and either allocated for

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development or, if not required for development during the Plan period, identified as safeguarded land.

The amendments to the New Diagram (CSA35) and the Map (CSA36) should be amended in accordance with the changes sought to CSA33 and CSA34.

**Change to the policy requested:**

For reasons set out in response to CSA33 and CSA34, it is the respondents' view that additional land should be removed from the Green Belt to the south of the railway, east of Keynsham and west of Saltford and either allocated for development or, if not required for development during the Plan period, identified as safeguarded land.

The amendments to the New Diagram (CSA35) and the Map (CSA36) should be amended in accordance with the changes sought to CSA33 and CSA34.

**Respondent Number:** 4803 **Comment Number:** 14 **Respondent Name:** Simon Steel-Perkins

**Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA35 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

12. The concept diagram fails to include residential development on the land to the north of the A4 and as such need to be amended to reflect the ability to deliver residential development on the site.

**Change to the policy requested:**

**Respondent Number:** 4934 **Comment Number:** 1 **Respondent Name:** Nigel Bray

**Respondent Organisation:** Railfuture Severnside

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA35 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Railfuture has no view on the precise configuration of the development at East Keynsham but believes the proposal is sound because it is close to major public transport routes, which therefore encourages use of sustainable transport modes offering an alternative to car use.

We strongly support the enhancement of train services and passenger facilities at Keynsham station. This development is likely to strengthen the case for improving the station and its services. In the longer term, people living on the eastern side of Keynsham may find a reopened Saltford Station more convenient for travel to Bath and points east. The siting of the development is therefore sound for this reason also.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4993 **Comment Number:** 3 **Respondent Name:** Susan Jones**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA35 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

Creating cycle routes is all very well, but a route is shown as passing into the Woodland from the proposed Residential Development. As the Woodland does not permit cyclists, this seems rather perverse. Also there is currently no official access to the Woodland from this direction (although lots of unofficial ones caused by people breaking down the fences), so a new one would have to be formed.

Also, on the map not all the existing rights of way are shown. According to the OS maps there is one that runs across the fields being proposed for Residential development to join with the one running between the school fields and the current open fields. All paths should be shown on a map proposing changes.

**Change to the policy requested:**

Add all public footpaths to the map. Remove cycle access to Woodland. Emphasise that the hedge bounding the Woodland will be strengthened and proper access made from the housing to the woods for pedestrians only.

**Respondent Number:** 5000 **Comment Number:** 1 **Respondent Name:** Julian F Hanham**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA35 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

Change Ref CSA 35 Concept Diagram:-

- The reduction of the Green Belt to the south of the A4 can not be justified for the following reasons:-
  - 1.The local countryside amenity area potential for all residents is severely curtailed, including that of the Community Wood.
  - 2.The original planning concept of a green 'buffer' between Keynsham and Saltford begins to be compromised.
  - 3.The opportunity to extend the Manor Road Community Wood towards the north and west will be lost.

N.B. A compromise solution could allow some housing between the A4 and the retained hedge / trees, in a contained strip of land to include part of the safeguarded land to the east.

**Change to the policy requested:****Respondent Number:** 5169 **Comment Number:** 2 **Respondent Name:** Mr Geoff Dunford**Respondent Organisation:** The River Regeneration Trust**Agent ID:** 26 **Agent Name:** Built4Life**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA35 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

Support:

CSA35 refers to the Concept Diagram to accompany Policy KE3A Land adjoining East Keynsham (Ref. Concept Map, Strategic Green Belt Site Allocation East Keynsham map, Annex 2 p.61). The map identifies land as the Preferred Strategic Site allocation for East Keynsham. It identifies the site allocated for residential and employment development in East Keynsham including a revised detailed Green Belt boundary. In identifying the preferred site KE3A, other sites such as KM1 were considered through the Sustainability Appraisal process as is required of Act, Policy and Government Guidance including the National Planning Policy Framework. As B&NES states, "The appraisal has informed the identification of the strategic site allocations subject to this consultation. It includes an appraisal of the strategic sites considered and those not being taken forward."

We believe that KM1 and not KE3A should be the Preferred Strategic Site allocation that is taken forward. We also believe that KM1 was not given a fair consideration in the revised Sustainability Appraisal nor the East Keynsham Sustainability Appraisal Matrix; given the evidence base available to the B&NES Planning Team and its Consultants. The River Regeneration Trust had two lengthy meetings with the B&NES Planning Team (30th September & 21st October 2013) and provided them with documents, proposals and three development options using CityCAD to help inform their review of the Sustainability Appraisal for East Keynsham, and ultimately their selection of preferred site(s) and lands to be released from Green Belt or safeguarded for future development. Just so that you are clear and understand the situation:

A - "The purpose of sustainability appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of revisions of Regional Spatial Strategies (RSS) and for new or revised Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs)." Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (Paragraph 1.1)

B - "Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular, they should carefully consider the inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development." Planning Policy Statement 1: Delivering Sustainable Development (paragraph 24)

C - "...sustainability appraisal is mandatory for RSS revisions and for new or revised DPDs and SPDs [Supplementary Planning Documents]." Planning and Compulsory Purchase Act 2004 (Section 39(2))

D - "The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles..... These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solution." National Planning Policy Framework (Paragraphs 6, 7 (part) & 8))

It is our understanding that A, B and C above help to ensure delivery of D and that Sustainability Appraisal is the vehicle for deciding options and site allocations because it aggregates the key social, economic and environmental items into one appraisal – Revised Sustainability Appraisal Matrix for Keynsham East, November 2013 (attached).

It is of our opinion and based on the evidence before us, that B&NES Planners have not included in their review of the Sustainability Appraisal for East Keynsham the evidence submitted to them on the following dates:

1. Avon Valley Farm Access Map, also submitted during the Core Strategy Schedule of Changes Hearing in May 2013
2. Availability and Deliverability of Housing in A1-A3 report on 22nd September 2013
3. Overall and Phase 1 summaries for each of Options A-C including Job number calculations hand-delivered during the meeting on 21st October 2013
4. Sections of the Draft Broadmead Peninsula Scoping Study (Executive Summary, Transport section, Green belt extract and Circular Economy extract) on 30th October 2013

They may argue that some of this was too late for the review, but we know that they considered information from documents submitted to them in October and possibly November (transport access statement), so there is little excuse for not including 1-4 above, given that they were requested by and issued to B&NES Planning Team. They may also argue that two Sustainability Indicators, access to site and landscape impact, were their main reasons for 'rejecting' KM1; both of which are being resolved in our ongoing plans and proposals.

It is also our understanding that B&NES Planners are using the Sustainability Appraisal for Keynsham East to justify allocation of Strategic Sites to be released from Green Belt and Safeguard land for future development now, and not during the Placemaking Plan as was their initial intention. This is not allowing sufficient time for proper consideration and due process. Similarly, that this is a one chance only to get land released from Green Belt or Safeguarded up to 2029 and that no matter how many 'reviews' are undertaken in 2016 or thereafter, 'inappropriate development' (e.g. allocated affordable housing, houseboats for boat dwellers, homes for alternative lifestyles, retirement homes and build-to-rent homes) will not be permitted in the Green Belt.

The River Regeneration Trust (formerly the River Corridor Group) and Built4Life (initial Agent of Avon Valley Farm and Broadmead Properties) have continued to positively engage with the Core Strategy hearings and the B&NES Planning Team for almost four years. Both The River Regeneration Trust and Built4Life have delivered a number of public engagement exercises, published reports, and promoted their ideas on Broadmead Peninsula to Cabinet, Council and Officers on a number of occasions. We have delivered presentations to the people of Keynsham on two occasions at The Cadbury Club and Keynsham Town Council, we have been positively published in The Week in and Keynsham Matters and shown our ideas at St Michael Church and during Bath City Week. We have constantly engaged with the community and involved them with our ideas for years, as is expected by the Neighbourhood Planning Protocol. Our proposal in KM1 is to create at least 500 new, permanent full time jobs from manufacturing to market gardens, we will build an array of private and affordable homes to suit a range of lifestyles and embed teaching and learning about our hydrological world and environment through a marina, constructed wetland, water ecology park and early learning aquatic centre. It does not encroach upon the Green Belt gap between Saltford and Keynsham, as the current preferred site does. KM1 is far more sustainable and respectful of Green Belt than other sites being considered.

All that we ask is that our proposals for Broadmead Peninsula and KM1 are given a fair and considered hearing through a Sustainability Appraisal that utilises the evidence base, then let the Placemaking process decide the Preferred Strategic Site allocation for East Keynsham. Without this, we believe that the Core Strategy is Unsound, as the consideration and allocation of a Strategic Site allocation in East Keynsham has not been positively prepared using the evidence base available, nor taken account of the added value Broadmead Peninsula would bring to delivering items in the Infrastructure Delivery Programme and facilitation of the Environment Park on Broadmead landfill Site as identified in the West of England Joint Waste Core Strategy. This was clearly defined in:

1. Availability and Deliverability of Housing in A1-A3 report on 22nd September 2013
2. Overall and Phase 1 summaries for each of Options A-C including Job number calculations hand-delivered during the meeting on 21st October 2013
3. Sections of the Draft Broadmead Peninsula Scoping Study (Executive Summary, Transport section, Green belt extract and Circular Economy extract) on 30th October 2013
4. Avon Valley Farm Access Map, also submitted during the Core Strategy Schedule of Changes Hearing in May 2013
5. East Keynsham Sustainability Appraisal Matrix

**Change to the policy requested:**

Land adjoining East Keynsham (North of railway line) on the Broadmead Peninsula which is currently alternative option KM1, should be identified as the Preferred Strategic Site allocation for East Keynsham and not KE3A. This would be defined by a fair and considered Sustainability Appraisal of the evidence base. This would demonstrate that the Preferred Strategic Site allocation for East Keynsham was the most sustainable location for release of Green Belt and safeguarding land for future development.

It would also demonstrate soundness in that due and proper consideration was given to actual new employment numbers and not employment floorspace, that agricultural land released from Green Belt or safeguarded was in the best interest of people, nature and food security, and that affordable and allocated homes for key workers, boat dwellers and alternative lifestyles were justly considered. These are all key items of the Broadmead Peninsula Scoping Study which is available on the B&NES Core Strategy list of documents.

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The above should be reflected in a revised Concept Diagram to accompany Policy KM1 (not KE3A) Land adjoining East Keynsham (Ref. Concept Map, Strategic Green Belt Site Allocation East Keynsham map, Annex 2 p.61).

**Respondent Number:** 5172 **Comment Number:** 1 **Respondent Name:** Mr Pinkerton

**Respondent Organisation:** Broadleaze Nurseries

**Agent ID:** 197 **Agent Name:** CMS Architects

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA35 Land adjoining East Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The proposed revision to the green belt boundary in this location does not extend as far as the Broadleaze Nursery site, which provides a valuable local asset in the form of a nursery and retail operation.

There are a number of structures on the site, and the ability for the business to grow will be greatly enhanced by its removal from designated green belt land.

The diagram below outlines the area of land that this representation wishes to add to the adjustment to the green belt boundary.

**Change to the policy requested:**

## Change Reference: CSA36 Land adjoining East Keynsham

**Respondent Number:** 4588 **Comment Number:** 6 **Respondent Name:**

**Respondent Organisation:** Withies Farm Landowners' Group,

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA36 Land adjoining East Keynsham

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**

**Support:**

For reasons set out in response to CSA33 and CSA34, it is the respondents' view that additional land should be removed from the Green Belt to the south of the railway, east of Keynsham and west of Saltford and either allocated for development or, if not required for development during the Plan period, identified as safeguarded land.

The amendments to the New Diagram (CSA35) and the Map (CSA36) should be amended in accordance with the changes sought to CSA33 and CSA34.

**Change to the policy requested:**

For reasons set out in response to CSA33 and CSA34, it is the respondents' view that additional land should be removed from the Green Belt to the south of the railway, east of Keynsham and west of Saltford and either allocated for development or, if not required for development during the Plan period, identified as safeguarded land.

The amendments to the New Diagram (CSA35) and the Map (CSA36) should be amended in accordance with the changes sought to CSA33 and CSA34.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5005 **Comment Number:** 1 **Respondent Name:** Peter Upsher**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA36 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

With ref to the proposed amendment KE3A. The concern is the proposed residential area to the east of Wellsway school. The B&NES Core Strategy proposes substantial population increase along the Keynsham / Bath corridor but there appears to be no joined up thinking between increased population & road improvements to cope with huge increase in commuter traffic. Saltford will bear the full effect of the strategy proposals with regards to the A4 traffic density. Eventually there will have to be a "Saltford Bypass" proposal if the whole of the A4 is not to grind to a complete halt. The proposal in KE3A clearly blocks off (for ever!!) the most logical starting point for a future A4 Saltford bypass. The Removal of this residential block will at least allow for future thoughts to be considered.

**Change to the policy requested:**

Please remove the residential area to the east of Wellsway school to allow for an integrated population increase / traffic plan to be arrived at!!

**Respondent Number:** 5169 **Comment Number:** 3 **Respondent Name:** Mr Geoff Dunford**Respondent Organisation:** The River Regeneration Trust**Agent ID:** 26 **Agent Name:** Built4Life**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA36 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

CSA36 refers to the Policies Map to show the boundary of the strategic site allocation for Land adjoining East Keynsham and the revised Green Belt boundary (Ref. Strategic Green Belt Site Allocation East Keynsham map, Annex 2 p.67). CSA36 identifies the Current and Proposed Green Belt for East Keynsham in order to make allowance for land to be released from Green Belt or safeguarded for future development i.e. the Preferred Strategic Site allocation. In identifying the Green Belt release for the preferred site KE3A, other sites such as KM1 were considered through the Sustainability Appraisal process as is required of Act, Policy and Government Guidance including the National Planning Policy Framework. As B&NES states, "The appraisal has informed the identification of the strategic site allocations subject to this consultation. It includes an appraisal of the strategic sites considered and those not being taken forward."

We believe that KM1 and not KE3A should be the Preferred Strategic Site allocation that is taken forward. We also believe that KM1 was not given a fair consideration in the revised Sustainability Appraisal nor the East Keynsham Sustainability Appraisal Matrix; given the evidence base available to the B&NES Planning Team and its Consultants. The River Regeneration Trust had two lengthy meetings with the B&NES Planning Team (30th September & 21st October 2013) and provided them with documents, proposals and three development options using CityCAD to help inform their review of the Sustainability Appraisal for East Keynsham, and ultimately their selection of preferred site(s) and lands to be released from Green Belt or safeguarded for future development. Just so that you are clear and understand the situation:

A - "The purpose of sustainability appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of revisions of Regional Spatial Strategies (RSS) and for new or revised Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs)." Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (Paragraph 1.1)

B - "Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular, they should carefully consider the inter-relationship between social inclusion, protecting and

enhancing the environment, the prudent use of natural resources and economic development.” Planning Policy Statement 1: Delivering Sustainable Development (paragraph 24)

C - “...sustainability appraisal is mandatory for RSS revisions and for new or revised DPDs and SPDs [Supplementary Planning Documents].” Planning and Compulsory Purchase Act 2004 (Section 39(2))

D - “The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles..... These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solution.” National Planning Policy Framework (Paragraphs 6, 7 (part) & 8))

It is our understanding that A, B and C above help to ensure delivery of D and that Sustainability Appraisal is the vehicle for deciding options and site allocations because it aggregates the key social, economic and environmental items into one appraisal – Revised Sustainability Appraisal Matrix for Keynsham East, November 2013 (attached).

It is of our opinion and based on the evidence before us, that B&NES Planners have not included in their review of the Sustainability Appraisal for East Keynsham the evidence submitted to them on the following dates:

1. Avon Valley Farm Access Map, also submitted during the Core Strategy Schedule of Changes Hearing in May 2013
2. Availability and Deliverability of Housing in A1-A3 report on 22nd September 2013
3. Overall and Phase 1 summaries for each of Options A-C including Job number calculations hand-delivered during the meeting on 21st October 2013
4. Sections of the Draft Broadmead Peninsula Scoping Study (Executive Summary, Transport section, Green belt extract and Circular Economy extract) on 30th October 2013

They may argue that some of this was too late for the review, but we know that they considered information from documents submitted to them in October and possibly November (transport access statement), so there is little excuse for not including 1-4 above, given that they were requested by and issued to B&NES Planning Team. They may also argue that two Sustainability Indicators, access to site and landscape impact, were their main reasons for ‘rejecting’ KM1; both of which are being resolved in our ongoing plans and proposals.

It is also our understanding that B&NES Planners are using the Sustainability Appraisal for Keynsham East to justify allocation of Strategic Sites to be released from Green Belt and Safeguard land for future development now, and not during the Placemaking Plan as was their initial intention. This is not allowing sufficient time for proper consideration and due process. Similarly, that this is a one chance only to get land released from Green Belt or Safeguarded up to 2029 and that no matter how many ‘reviews’ are undertaken in 2016 or thereafter, ‘inappropriate development’ (e.g. allocated affordable housing, houseboats for boat dwellers, homes for alternative lifestyles, retirement homes and build-to-rent homes) will not be permitted in the Green Belt.

The River Regeneration Trust (formerly the River Corridor Group) and Built4Life (initial Agent of Avon Valley Farm and Broadmead Properties) have continued to positively engage with the Core Strategy hearings and the B&NES Planning Team for almost four years. Both The River Regeneration Trust and Built4Life have delivered a number of public engagement exercises, published reports, and promoted their ideas on Broadmead Peninsula to Cabinet, Council and Officers on a number of occasions. We have delivered presentations to the people of Keynsham on two occasions at The Cadbury Club and Keynsham Town Council, we have been positively published in The Week in and Keynsham Matters and shown our ideas at St Michael Church and during Bath City Week. We have constantly engaged with the community and involved them with our ideas for years, as is expected by the Neighbourhood Planning Protocol. Our proposal in KM1 is to create at least 500 new, permanent full time jobs from manufacturing to market gardens, we will build an array of private and affordable homes to suit a range of lifestyles and embed teaching and learning about our hydrological world and environment through a marina, constructed wetland, water ecology park and early learning aquatic centre. It does not encroach upon the Green Belt gap between Saltford and Keynsham, as the current preferred site does. KM1 is far more sustainable and respectful of Green Belt than other sites being considered.

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

All that we ask is that our proposals for Broadmead Peninsula and KM1 are given a fair and considered hearing through a Sustainability Appraisal that utilises the evidence base, then let the Placemaking process decide the Preferred Strategic Site allocation for East Keynsham. Without this, we believe that the Core Strategy is Unsound, as the consideration and allocation of a Strategic Site allocation in East Keynsham has not been positively prepared using the evidence base available, nor taken account of the added value Broadmead Peninsula would bring to delivering items in the Infrastructure Delivery Programme and facilitation of the Environment Park on Broadmead landfill Site as identified in the West of England Joint Waste Core Strategy. This was clearly defined in:

1. Availability and Deliverability of Housing in A1-A3 report on 22nd September 2013
2. Overall and Phase 1 summaries for each of Options A-C including Job number calculations hand-delivered during the meeting on 21st October 2013
3. Sections of the Draft Broadmead Peninsula Scoping Study (Executive Summary, Transport section, Green belt extract and Circular Economy extract) on 30th October 2013
4. Avon Valley Farm Access Map, also submitted during the Core Strategy Schedule of Changes Hearing in May 2013
5. East Keynsham Sustainability Appraisal Matrix

### Change to the policy requested:

Land adjoining East Keynsham (North of railway line) on the Broadmead Peninsula which is currently alternative option KM1, should be identified as the Preferred Strategic Site allocation for East Keynsham and not KE3A. This would be defined by a fair and considered Sustainability Appraisal of the evidence base. This would demonstrate that the Preferred Strategic Site allocation for East Keynsham was the most sustainable location for release of Green Belt and safeguarding land for future development.

It would also demonstrate soundness in that due and proper consideration was given to actual new employment numbers and not employment floorspace, that agricultural land released from Green Belt or safeguarded was in the best interest of people, nature and food security, and that affordable and allocated homes for key workers, boat dwellers and alternative lifestyles were justly considered. These are all key items of the Broadmead Peninsula Scoping Study which is available on the B&NES Core Strategy list of documents.

The above should be reflected in a revised Policies Map to show the boundary of the Strategic Site allocation for Land adjoining East Keynsham and the revised Green Belt boundary for KM1, north of the railway line and not KE3A (Ref. Strategic Green Belt Site Allocation East Keynsham map, Annex 2 p.67).

**Respondent Number:** 5170 **Comment Number:** 2 **Respondent Name:** Mr Cunningham

**Respondent Organisation:** Alder King Planning Consultants

**Agent ID:** 195 **Agent Name:** Alder King Planning Consultants

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA36 Land adjoining East Keynsham

**Location:**

### Comment made on the Proposed Change:

Support:

3.2 Our principal request is that the Key Diagram and Policies Map and Concept Diagram relating to policy KE3A is amended to include the designation of cell C4 for residential development.

### Change to the policy requested:

4.1 The Framework requires that local planning authorities use their evidence base to ensure that their local plan meets the full objectively assessed needs for market and affordable housing in the housing market area. It is considered that the Core Strategy housing requirement is too low, and will in all likelihood need to be increased when taking account of the continued economic recovery and the growth requirements of Bristol City.

4.2 The Framework makes clear Green Belt boundaries should only be amended in exceptional circumstances through the preparation or review of a Local Plan. Given the likelihood of the housing requirement being increased to address housing need, this is considered to be an exceptional circumstance to warrant a further amendment to the Green Belt boundary to include land cell C4 for housing development.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 5170 **Comment Number:** 1 **Respondent Name:** Mr Cunningham**Respondent Organisation:** Alder King Planning Consultants**Agent ID:** 195 **Agent Name:** Alder King Planning Consultants**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA36 Land adjoining East Keynsham**Location:****Comment made on the Proposed Change:**Support: 

2.19 Land cell C4 is deliverable and its development would not undermine the five purposes of the Green Belt as identified in the Framework.

**Change to the policy requested:**

4.1 The Framework requires that local planning authorities use their evidence base to ensure that their local plan meets the full objectively assessed needs for market and affordable housing in the housing market area. It is considered that the Core Strategy housing requirement is too low, and will in all likelihood need to be increased when taking account of the continued economic recovery and the growth requirements of Bristol City.

4.2 The Framework makes clear Green Belt boundaries should only be amended in exceptional circumstances through the preparation or review of a Local Plan. Given the likelihood of the housing requirement being increased to address housing need, this is considered to be an exceptional circumstance to warrant a further amendment to the Green Belt boundary to include land cell C4 for housing development.

**Change Reference: CSA37 Land adjoining South West Keynsham****Respondent Number:** 93 **Comment Number:** 5 **Respondent Name:** Highways Agency**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA37 Land adjoining South West Keynsham**Location:** Land adjoining South West Keynsham**Comment made on the Proposed Change:**Support: 

The site-specific placemaking principles in respect of transport are broadly supported.

The Agency considers that the potential for Parkhouse Lane to be used as an alternative route for cyclists and pedestrians to reach Keynsham town centre should be more strongly highlighted in the draft policy

**Change to the policy requested:****Respondent Number:** 180 **Comment Number:** 2 **Respondent Name:****Respondent Organisation:** J S Bloor Ltd**Agent ID:** 19 **Agent Name:** Pegasus Planning Group**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA37 Land adjoining South West Keynsham**Location:** Land adjoining South West Keynsham

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

The allocation of a strategic site in the Green Belt at land adjoining South West Keynsham is supported.

We have previously made representations to request that strategic sites are allocated in the Core Strategy in order to be consistent with the NPPF para 47 which states that the Local Plan should identify key sites which are critical to the delivery of the housing strategy over the plan period.

The Inspector expressed concern in his note ID/40 that identifying only broad locations in the Core Strategy and leaving the allocation of specific sites to the Placemaking Plan would mean that new housing would not be delivered quickly enough.

It is evident in BANES that if the Council is to maintain at least a 5 housing land supply, then sites within the Green Belt need to be identified in the Core Strategy. The Inspector in ID/40 para 17 stated that, "Making at least some of the strategic broad locations specific allocations in the core strategy would enable the plan to contribute directly to the 5 year supply at adoption."

However, the proposed amendments to the spatial strategy provide an insufficient response and an inadequate review of the Green Belt, in view of the potential scale of future housing needs in B&NES and Bristol. Land at South West Keynsham has the potential to accommodate a greater number of dwellings than the 200 identified in the Schedule of Amendments (Nov 2013). As we have stated in our previous representations, it is considered that the release of the Green Belt in the south west of Keynsham should be greater in order to safeguard land for the longer term and in order to be considered with national policy and in order to be effective.

Pegasus have submitted a detailed Sustainability Appraisal which included a Landscape and Visual Appraisal, Ecology Assessment, Archaeological and Heritage Appraisal, Flood Risk and Drainage and Traffic and Transport and utilities along with a concept plan illustrating the layout for approximately between 900 dwellings at 30 dph.

**Change to the policy requested:**

Amendments should be made to Policy KE4 so that land will be safeguarded to meet the longer term development needs at south west Keynsham or if housing delivery indicates a shortfall in provision the additional area should come forward to meet housing needs.

**Respondent Number:** 180**Comment Number:** 10**Respondent Name:****Respondent Organisation:** J S Bloor Ltd**Agent ID:** 19 **Agent Name:** Pegasus Planning Group**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA37 Land adjoining South West Keynsham**Location:** Land adjoining South West Keynsham**Comment made on the Proposed Change:**Support: 

Whilst the identification of land adjoining South West Keynsham to be removed from the Green Belt and allocated for residential development is welcomed, we do have some detailed points about the wording of the policy.

1. The "requirements that need to be met to enable the development" should be included in the Core Strategy in accordance with the NPPF para 157 advises that Local Plans should allocated sites to promote development and provide detail on form, scale, access and quantum of development. Paragraph 17 suggests that a framework should be provided within which decisions on planning applications can be made with a high degree of predictability and efficiency; and paragraph 154 states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.

2. Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions). NPPG

3. The paragraph above the Placemaking Principles should be reworded to provide clear guidance consistent with the Core Strategy and provide further detailed policy as required to develop the site.

4. Placemaking Principles set out in the Policy:

- 1. Density - It is considered that a more appropriate density on the edge of the settlement would be 30 dph but this could vary across the site.
- 6. Landscape Buffer - An objection is made to Parkhouse Lane forming the boundary of the site. Previous submissions by Pegasus on behalf of Bloors have demonstrated that the site is deliverable and a larger number of dwellings can be accommodated by extending the site in a southerly direction. The Landscape Critique submitted with these representations supports the direction of growth. A landscape buffer can be established with includes a larger site.
- 11. Direct Access - Reference is made to a direct access to Charlton Road – this is supported and shown on the attached concept plan. The Policy also refers to a “through link to K2a sufficient to enable bus service provision to pass through the sites without turning” – this will depend on what is proposed for K2a.
- 15 Solar energy – the policy states that solar potential of sites should be facilitated by design and orientation. The policy goes on to state that development will be expected to provide sufficient renewable energy generation to reduce carbon dioxide emissions from energy use in buildings by at least 20%. The NPPF states that when setting local requirements for buildings sustainability, to do so in a way consistent with the Governments zero carbon policy and adopt nationally prescribed standards. The Planning and Energy Act 2008 permits local authorities to set energy efficiency standards that exceed the energy requirements of building regulations. However, although the Council are within their right to set a requirement for Code for Sustainable Homes Level 5 in 2014, DCLG have undertaken a Housing Standards Review, issued for consultation in August 2013. The review states that the Government is committed to Building Regulations as the way to drive up energy performance. The Government has set a clear end point for strengthening Building Regulations, with the zero carbon standards the equivalent of Code Level 5 anticipated in 2016. The Housing Standards review suggests the Governments conclusion is that there is no need for levels or separate carbon and energy targets in the Code, carbon and energy targets should be set in building regulations as we move towards zero carbon homes. The policy wording seeks to bring in Level 5 requirements two years before an equivalent standard will be required through Building Regulations.

It should also be noted that the Renewable Energy Research Report by CAMCO in November 2010 (as part of the evidence base for the Core Strategy) states in section 7.4 that should BANES Council encourage zero carbon homes before 2016 then it needs to demonstrate that local circumstances can enable this to be achieved. It also states that Zero carbon development will be difficult to achieve ahead of 2016. The report states “this study does not, therefore, support bringing forward tighter carbon standards in advance of national requirements based on current technology and the expected type and scale of new development across the district”. It is considered that enforcing stricter building standards beyond Building Regulations is unreasonable and contrary to the evidence base.

In relation to suggesting 20% of energy use of a building should come from renewable energy Paragraph 229 in the review states “the Government considers that the progressive strengthening of Building Regulations means it is no longer appropriate for local plan policies to specify additional standards for how much energy use from homes should come from on-site renewables. Developers should be free to decide the most appropriate solutions to meet stronger building regulations”.

The Climate and Energy Act 2008 permits Local Authorities to set standards beyond building regulations as long as they can be demonstrated to be reasonable and Policy KE4 seek 20% renewable energy targets from new development. It is felt that this target is unreasonable for the following reasons:

- The Bath and North East Somerset Renewable Energy Research and Planning report by CAMCO (2009) recommended that a more ambitious target for renewable energy set at 20% rather than 10% was realistic. However, as the report acknowledges the renewable target of 20% within the former RSS was rejected by the Secretary of State in favour of 10%. In addition, RSS Policy RE5 (to which the CAMCO report draws upon) suggests renewable energy may not be required if it is deemed unfeasible. Holding development to a 20% renewables target without establishing a clear viability is unreasonable.
- It is considered that the BANES Renewable Energy Research Report by CAMCO 2009 is outdated as it was prepared prior to the NPPF. In addition, Government policy and thinking has moved forward since this point, especially in light of the Housing Standards Review indication that the Planning Act 2008 may be repealed, therefore the recommendations in the Energy Research Report are considered out of date.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

The policy should be redrafted as follows:

The second paragraph should be re-worded as:

The Place Making Principles are consistent with the Core Strategy and set out the requirements that need to be met when the site is brought forward for development.

Density should be revised to 30 dph.

The extent of the site should be increased so that it can accommodate development beyond 200 dwellings and the site layout should allow for the extension of the development site should Keynsham need to expand in the future ( as recognised in the Arup Report page 40).

The issues of safeguarding should be included in Policy KE4 (the Sustainability Appraisal and more recent evidence attached to these representations shows that the site can be developed.)

Reference to achieving code for sustainable homes level 5 by 2014 should be amended to 2016 and Policy KE4 reference to BREEAM excellent by 2012 should be amended to 2019. These amendments will bring the policies more in line with current government thinking and ambitions.

The obligation to provide 20% renewable energy should be removed in favour of either setting a 10% target and/or re-writing the policy to allow a more flexible approach for developers to achieve carbon reductions equivalent to 20%. Current Policy wording for Policy KE4 should be amended with a caveat that supports renewable energy provided it is viable.

**Respondent Number:** 184 **Comment Number:** 5 **Respondent Name:** Paul Davis

**Respondent Organisation:** Persimmon Homes Severn Valley

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA37 Land adjoining South West Keynsham

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**Support: 

Persimmon Homes Severn Valley support the principle of removing land from the Green Belt at South West Keynsham but consider there is scope to release additional land either now or as safeguarded land for future release.

Persimmon Homes Severn Valley consider there is scope to extend the proposed green belt release to the South West of Keynsham to include land to the West of Charlton Road (and other land to the South of Lays Farm Trading Estate) to enable a logical gateway to Keynsham to be created from the south and provide a defensible landscaped development boundary to the green belt.

PHSV consider the evidence base used to restrict the proposed South West Keynsham strategic allocation to the land East of Charlton Road is wrong, and the scope exists to provide a larger extension. PHSV consider that land to the West of Charlton Road was dismissed too early in the process and was not given proper consideration and subjected to the full assessment of the land that has been released. Therefore the Council's evidence base is flawed because they cannot properly demonstrate that the most appropriate area was released.

Document CD9/CO4 (March 2013) is a development concept options report for land south of K2 and identifies a number of constraints in section 3.1 which are illustrated in a Constraints and Opportunities Plan. One of the constraints identified is a gas pipe line where the document says 'the gas pipe line runs along and through the west of the study area and constrains neighbouring developments. The pipeline is protected by an HSE regulated zone which permits residential development within only the outer zone (beyond 70 metres either side of the pipe line).'

A similar section and additional plan is contained CD9/CO6 as the pipe line continues northwards to Lays Farm.

Persimmon Homes Severn Valley consider there are 3 problems with this assessment:

- The line of the pipeline shown on the plan is incorrect
- There is an assumption that the HSE buffer prevents any development within the 70 metres zone
- As a result of the pipeline being shown incorrectly, the buffer would constrain the whole site whereas if the line was correctly plotted there is development potential on the land west of Charlton Road.

Having discussed the issue with Wales and West Utilities, Persimmon Homes Severn Valley considers the plan contained in document CD9/H5 shows the accurate line of the gas main. This demonstrates that even when excluding development from the whole of the buffer zone, there is sufficient land to provide for development which would logically link to South of Lays Farm and complete a South Western extension of Keynsham. The land West of Charlton Road has therefore been incorrectly dismissed and it should have been included as part of alternative KN3. That would have made KN3 realistic and viable in Green Belt terms, resulting in a single Green Belt release rather than two dispersed and unconnected parcels.

In addition, it is likely that additional land could be developed in the buffer zone so increasing the potential development. In order to demonstrate that land West of Charlton Road is a viable alternative PHSV have taken technical advice which demonstrates that various mitigation measures can be taken to reduce the consultation area in the PADHI process which would release a larger area of development and also allow land within the consultation area to be used for landscaping to create an appropriate buffer and rural edge to the development. However, the pipe line would remain and would therefore provide a very permanent limit to the development in this location, and enable a paramagnet landscaped boundary to the Green Belt to be established.

PHSV also consider that an inappropriate requirement was put on the selection criteria for an urban extension South West of Keynsham, in that it had to provide for 200 dwellings. This has led to the rejection of the Northern part of KN3 because it could not meet 200 dwellings. However, it is equally wrong to restrict the scope of the green belt release South West of Keynsham to a total of 200 dwellings which is arbitrary and meaningless indeed in Green Belt terms it is more appropriate to release larger parcels of land rather than small incremental releases to the Green Belt in order to maintain the integrity and permanence of the Green Belt in the future.

PHSV consider that the Council should have carried out the sort of analysis outlined above. Indeed there was a suggestion at one time that there was scope for further development in South West Keynsham. In the Councils report to Full Council on the 4th of March 2014 the report says at Paragraph 5.15 'there may be scope for additional development in this location and the place making plan provides the opportunity to work with the local community to establish the parameters and nature of the development as well as identify if there is an scope for safeguarded land for the longer term.'

'The need for housing and the advantages of Keynsham's location provide the exceptional circumstances justifying the release of land in this location'.

Helpfully the above quote recognises there may be scope for additional development in this location to be identified through the subsequent place making plan. However, PHSV do not consider that the place making plan is the right route for removing land from the Green Belt immediately following the Core Strategy adoption. That would be contrary to NPPF 83 which confirms that 'Green Belt boundaries should only be altered in exceptional circumstances through preparation or review of the Local Plan'. With 'regards to their intended permanence in the long term so that they should be capable of enduring beyond the plan period'. Therefore having identified there may be scope for additional development at South West Keynsham, PHSV consider the Council should have carried out a full analysis of all the land capable of forming a Green Belt extension to the South West of Keynsham including a proper assessment of the actual constraints of the pipe line, and dealt with Green Belt issues comprehensively in the Core Strategy.

PHSV consider the case for further development in this location is compelling. Keynsham is an area well supported by public transport facilities and offering a range of local facilities and services and employment opportunities. Keynsham was identified as a suitable location for development by the Local Planning Inspector. West of Keynsham is a rounding off of the settlement of Keynsham and is well contained in the landscape and well related to the town centre, employment, school and other facilities both existing and planned as part of the K2 development. The Western boundary is defined by a

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

field hedgerow which is generally continuous along its length and is tall in stature and as such is prominent. There is a strong visual relationship between the land itself and the adjacent highway and also with the residential properties and Lays Farm to the North. The Lays Farm Business Centre currently defines the most Westerly point of Keynsham's development envelope and is reinforced by another existing tall hedgerow. As a consequence, development of the site would not materially extend the development boundary further westwards than that which exists.

North of Lays Farm there is ridge line which is broadly orientated North South across the area of open land and with the existing Western edge of Keynsham lying to the East and below the crest of the local high ground. As a result there is little indivisibility between the existing edge of Keynsham and the residential district of Stockwood further West in the Bristol City Council area. This topographical feature maintains visual as well as physical separation between Bristol and Keynsham.

Although the site falls within the Green Belt, the existing development which lies immediately to the North and East of the site provides a strong development framework within which development of the site would be framed. Development can be accommodated on the site without harming the purposes and objectives of the Green Belt and specifically the role it performs locally between Stockwood and Keynsham. The Western boundary of the site could be strengthened with tree cover to establish a stronger landscape framework to both visually and physically contain the development which in any event would also be restricted by the line of the pipe line. This would form a new urban edge to Keynsham in this locality and enable a new gateway to Keynsham to be formed without causing material harm in landscape and environmental terms or from a Green Belt point of view.

**Change to the policy requested:**

To fully and properly assess land west of Charlton Road with a view of extending land allocated in Policy KE4 and incorporate the following specific comments on the proposed policy KE4 set out in CSA 37 by paragraph number:

1. The concept diagram is purely indicative and therefore 'as shown' should be changed to 'as indicated'.
2. Reference to 'By Design' and successor guidance is an unnecessary level of detail and should be deleted.
3. There is conflict within the policy between the requirement for dwellings to front onto Charlton Road and the requirement on the concept diagram to retain existing trees on Charlton Road and also the requirement in paragraphs 7 and 8 to retain and strengthen existing hedgerows and trees surrounding the site and to provide for sufficient set back to allow for the growth of trees. PHSV consider it is appropriate for dwellings to front onto Charlton Road and the conflicting requirements of needing to maintain trees and landscape buffer to the edge of the development would be overcome by allocating land to the West of Charlton road which would also have dwellings fronting onto Charlton Road but would be landscaped on its Western boundary therefore providing a landscape buffer to the Green Belt.
13. It is inappropriate for the policy to anticipate specific highway provision and the clause needs to be redrafted in general terms to refer to necessary offsite highway improvements subject to further investigation.
15. In considering solar energy requirements it is important to maximise onsite and on plot solutions and allowable solutions should not be restricted to being provided in only exceptional circumstances.
16. The requirement for downstream sewer upsizing works and pumping station upgrade should be subject to further technical investigations.

<b>Respondent Number:</b> 262	<b>Comment Number:</b> 1	<b>Respondent Name:</b>	<b>Respondent Organisation:</b> Woodland Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>		<b>Attachments sent with the comment?</b> <input type="checkbox"/>	

**Change Reference:** CSA37 Land adjoining South West Keynsham

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**Support: 

Whilst we are pleased to see 'Placemaking Principles' 6, 7 and 8 in relation to trees and woodland, we are nevertheless objecting on a number of counts –

We reiterate our fundamental objection to the removal of this triangular area from the green belt. The Woodland Trust owns a popular community woodland known Abbots Wood in South West Keynsham bordering the Green Belt (grid ref: ST 645 672). The site lies within the Forest of Avon boundary and was created as a community wood for the millennium under the Trust's Millennium Commission backed 'Woods on Your Doorstep' project, supported by the then Countryside Agency and planted with the local community.

The Trust's aim is to manage Abbots Wood for its landscape benefit, nature conservation biodiversity and recreational/quality of life enjoyment by the local community. The proposed removal of land from the Green Belt to the south of Abbots Wood would not therefore be in the best interests of the wood or its enjoyment by the local community, because of the increased pressures arising from further development situated adjacent, such as visitor pressure, path erosion, litter, and biodiversity disturbance. Development is already approved in the Local Plan to the west and east of Abbots Wood, and further development to the south, would further detach the wood from the surrounding green space. This is in direct contravention of Government policy on biodiversity. For instance 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' (Defra, 2011) states: 'The mission for this strategy, for the next decade, is: to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'. It also states that: "The independent review of England's wildlife sites and ecological network, chaired by Professor Sir John Lawton, concluded that England's collection of wildlife areas (both legally protected areas and others) does not currently represent a coherent and resilient ecological network capable of responding to the challenges of climate change and other pressures. The review concluded that establishing such a network would effectively conserve biodiversity and ecosystem services, delivering many benefits to people, while also making efficient use of scarce land and resources". The surrounding of the important community biodiversity asset of Abbots Wood on all sides by built development runs directly contrary to this policy of establishing resilient connectivity.

We consider that it would not be in the best interests of Abbots Wood to end up as an increasingly isolated environmental asset bordered by 'hostile' land use. We would therefore like to see Abbots Wood form part of a wider considered Green Infrastructure strategy for SW Keynsham, with appropriate direct linkages to maintained to Forest of Avon sites and other community/nature conservation/public open space sites.

The proposed extension of the Green Belt, and its effect on Abbots Wood, would also contravene other national policy on biodiversity and woodland –

The National Planning Policy Framework (NPPF) supports the need for habitat protection by stating that: 'Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure', (DCLG, March 2012, para 114). Also para 117 states that: 'To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'.

The new England Biodiversity Strategy which makes it clear that protection of priority habitats like native woodland remains a key aim – 'Priority action: Bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England', (Biodiversity 2020: A strategy for England's wildlife and ecosystems services, DEFRA 2011, p.26).

The Government's Forestry Policy Statement (Defra 2013) clearly states that: "Biodiversity is fundamental to resilience. Greater diversity of species, genetic variability and larger and less fragmented forest woodland habitats better integrated with other habitats all contribute to this objective".

We do not see how this amendment to the Core Strategy can possibly comply with Government policy.

**Change to the policy requested:**

1. We would like to see amendment CSA37 (policy KE4) deleted in its entirety.

However if this deletion is not accepted, our further comments on the 'Placemaking Principles' are –

2. We would like to see a developer obligation included to provide for secure boundary fencing, appropriate entrance

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

'furniture' to manage public access, footpath surfacing and provision of litter collection on the southern boundary of Abbots Wood against the 'Land adjoining South West Keynsham Site Allocation'. Fencing and entrance furniture to be maintained by developer or management company thereafter.

3. We require confirmation that there will be no requirement for cycle or vehicle road access through Abbots Wood – foot access only. The Annex 2 Concept Map for South West Keynsham (p.62) contains a purple arrow into Abbots Wood which purports to indicate a 'Pedestrian and Cycle Link', and should be removed.

4. We would like to see a 10m buffer strip of informal open land maintained between the edge of Abbots Wood and any development curtilages.

5. We note the reference to financial contributions in 'Placemaking Principle' no.14 and would like to see the items listed in point 2 above also included here.

**Respondent Number:** 275    **Comment Number:** 7    **Respondent Name:** Redrow Homes South West    **Respondent Organisation:**

**Agent ID:** 164    **Agent Name:** DLP Planning Consultants

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA37 Land adjoining South West Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

No reference is made to land west of Keynsham in Paragraph 3.19A

The extent of the 'alternative option' identified on the plan at Annex 3 at Lays Farm, and identified with a potential capacity of 50 dwellings is based on wholly erroneous information as to the nature and position of a gas main shown on the (unnumbered) plan attached to the SHLAA and referred to by Arup in its review of Green Belt. This does not accord with the records held by Wales and West Utilities Ltd who own and operate the pipeline. The actual route of the pipeline runs some 100 metres further to the west (Ref: W&WU Pipeline Plan and letter from W&WU dated 12.06.2013 and attached at Appendix A to the Landscape and Visual Appraisal).

The impact of the existing pipeline on the development potential of the site is consequently minimal and certainly not such that would warrant disregarding it completely as a sustainable option. Moreover, it is feasible to divert the main, and Redrow have recently done just that elsewhere in Bristol, and by using modern materials it would further reduce any no-build easement to 6m.

This inaccurate information appears to have been the principal reason for Arup dismissing the land at Lays Farm as a serious option for release from the Green Belt, without properly assessing the scope for development here having regard to the purposes of Green Belt and in particular: preventing neighbouring towns merging into one another (i.e. Keynsham and Bristol); and preserving the setting and special character of historic towns (in this case, the Queen Charlton Conservation Area).

The site, south of Lays Farm (Ref: Area 10 BANES Sustainability Appraisal Report Annex L) is bound on two side by development and forms a far more logical addition to the built-up area of Keynsham than that proposed to be released from the Green Belt to the south (Ref: Area 13 BANES Sustainability Appraisal Report Annex L).

The Site is located adjacent to Charlton Road as it enters Keynsham from the south. It occupies an area of approximately 7.8 ha and is currently given over to pasture. Its northern and eastern boundaries are formed by built form, with its southern and western boundaries being rural in nature.

There is currently no public access onto the Site, although a well-used footpath runs along its southern boundary. There are no significant landscape features on the Site, other than the hedgerows which form the field boundaries.

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The Site sits at an elevation of 72.5m AOD to 59.5m AOD, and is broadly flat in nature, sloping slightly downwards to its eastern boundary with Charlton Road.

The Site's landscape and visual relationship with its surroundings is primarily with the landscape of the Charlton Valley and Stockwood to the west.

The Site sits within the LCA5 'Dundry Plateau' of the Rural Landscape of Bath and North East Somerset, a rural Landscape Character Assessment and has an 'open' character, typical of this area.

The visual appraisal (attached) showed that the Site is partially visible from several locations to the west, but generally within the context of existing built form.

BANES has, through its consultants, Arups, reviewed the Green Belt gap between Keynsham and Stockwood and identified and noted the easternmost field on the Lays Farm Site as potentially suitable for development. This area is outlined as part of Alternative Option KM3 in Annex 3 of the Schedule of Core Strategy Amendments - November 2013.

Arups' West Keynsham Development Concept Options Report (March 2013), should be reviewed, as it placed an existing high pressure gas main inaccurately on the Lays Farm Site, and also incorrectly presumed an overly wide easement zone associated with it. The incorrect location of this main heavily influenced Arups' 'Developable Area' which has fed through into the Schedule of Core Strategy Amendments.

In light of these inaccuracies the Site was revisited and the reappraised with particular consideration being given to: (1) Potential visual impact across the Charlton Valley; and (2) The setting of Queen Charlton (Conservation Area).

The landscape development strategy for the Site (see attached) has evolved out of the findings of the landscape and visual appraisal and the now correctly located, high pressure gas main. The proposal is to introduce development into the north-eastern part of the Site, set back from the western boundary and to introduce a significant strip of structure planting that is complementary to that which is found in the locality.

The introduction of a robust, defensible edge would ensure that in the long term the setting of Queen Charlton and the character of the Charlton Valley are not adversely affected by the introduction of development. Similarly the 'rounding off' of development in this south-eastern corner of the town, and the inclusion of the woodland strip would ensure that the separate identities of Keynsham and Queen Charlton are preserved as well as ensuring that there would not be a future coalescence with Stockwood to the west.

As such we do not believe development on the Site would compromise the purposes of the Green Belt (Ref: NPPF Para 80) with particular reference to preventing Keynsham merging with Bristol and preserving the historic setting and special character of Queen Charlton.

As a consequence of the above, the Site should be considered for inclusion within the land to be removed from the Green Belt and allocated for up to 150 dwellings.

### Change to the policy requested:

Land adjoining West Keynsham Site Allocation  
Policy KE4A

Land is removed from the Green Belt as shown on the Key Diagram and Policies Map and allocated for residential development and associated infrastructure during the Plan period.

The requirements that need to be met to enable development are set out in the Placemaking Principles, Core Policies and indicated on the Concept Diagram. The Placemaking Principles, being site specific, take priority over the Core Policies.

Placemaking Principles:

1. Residential development (to include 30% affordable housing) of around 150 dwellings in the plan period at Lays Farm, West Keynsham as shown on the concept diagram. The site should be developed at an average density of 35 dwellings per hectare.

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2. Preparation of a comprehensive Masterplan, through public consultation, and to be agreed by the Council, reflecting best practice as embodied in 'By Design' (or successor guidance), ensuring that development is well integrated with neighbouring areas.
3. Dwellings should front onto Charlton Road and have a positive relationship with all publicly accessible routes. Development should face outwards towards the open countryside,
4. Building heights to be generally limited to 2 storeys, ensuring development does not break the skyline in views from Queen Charlton Conservation Area once proposed structure planting has matured, with some 3 storey development fronting Charlton Road.
5. Incorporation of green infrastructure, including on site provision of well integrated formal and natural green space, play provision and allotments. A key part of the on site requirement should be the provision of woodland and copse planting along the south and western boundary as shown on the Concept Diagram, to provide a landscape buffer from views from the south and west, and strengthen the sylvan character of the area. New planting should maximise native species woodland edge habitat and provide for public access.
6. Retain and supplement the existing street trees along Charlton Road.
7. Direct highway access to be formed to Charlton Road.
8. Off site highway capacity improvements where required, including the St Ladoc Road/A4175 Bristol Road/Trescothick Close roundabout and A37/Queen Charlton Lane junction.
9. Financial contributions for primary school places and contribution in lieu of land will be required to meet any shortfall in primary school provision within the Keynsham primary school planning area.
10. Downstream sewer upsizing works and pumping station upgrade.

**Respondent Number:** 279    **Comment Number:** 7    **Respondent Name:** Rohan Torkildsen    **Respondent Organisation:** English Heritage

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA37 Land adjoining South West Keynsham

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**  **Support:**

Change ref: CSA37 Strategic Allocation SW Keynsham Placemaking Principles  
 The intention to retain and supplement the existing trees appears to address the suggested mitigation in the Heritage Assets Study (CD9/LV/1) and ensure the significance of the Charlton Conservation Area is maintained.

**Change to the policy requested:**

**Respondent Number:** 3095    **Comment Number:** 5    **Respondent Name:**    **Respondent Organisation:** CPRE Avonside

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA37 Land adjoining South West Keynsham

**Location:** Land adjoining South West Keynsham

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

This proposal encroaches onto the parish of Compton Dando, and will detract from the rural setting of the village. It will also add to traffic using the narrow lanes in the area as rat runs to avoid congestion on the A4 in journeys to Keynsham, Bath and Bristol.

**Change to the policy requested:**

We would like to see greater detail put into the landscaping and traffic-planning for the area within the Core Strategy.

**Respondent Number:** 3316 **Comment Number:** 2 **Respondent Name:**

**Respondent Organisation:** Keynsham Town Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA37 Land adjoining South West Keynsham

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**Support: 

2. Land adjoining South West Keynsham – CSA38/39

In respect of Highway access for this proposed development, access is to be formed to Charlton Road with a through link to K2a. In addition to these access/egress points the Town Council would seek that a further access be incorporated into the scheme leading from Charlton Road/Packhorse Lane Junction opening up Parkhouse Lane and continuing as a connection road into the site currently being developed at K2b. Furthermore, the distance of this site from central Keynsham and all major transport links are of concern.

In respect of point 6 of the change reference CSA37 Keynsham Town Council would reiterate the importance of the provision of woodland and copse planting at the South Westerly point of the proposed site to preserve the cross Parish boundary, between Keynsham Town and Compton Dando Parish, at this point of the site. The site without a green infrastructure buffer would be most detrimental to the visual amenity of the Chew Valley.

Of the two sites proposed for Keynsham this is the most prominent in terms of disturbance to the Green Belt and over development in a rural area.

**Change to the policy requested:**

**Respondent Number:** 4335 **Comment Number:** 1 **Respondent Name:** Mr Neil Fountain

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA37 Land adjoining South West Keynsham

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**Support: 

This proposal contravenes national green belt policy, it is a visual encroachment into the countryside which is not justified by economic growth arguments. It is highly visible and intrusive and impacts negatively on the adjacent conservation area of Queen Charlton.

In addition the highway infrastructure is totally inadequate to support this scale of development, in terms of both capacity and danger. The proposed 'amelioration measures' will not deal with this matter.

Change to the policy requested:

**Respondent Number:** 4603 **Comment Number:** 1 **Respondent Name:** Adrian Palmer  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA37 Land adjoining South West Keynsham

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**

Support:

Introduction

I submitted comments in May 2013, in response to the previous Consultation exercise. I believe that the proposed South West Keynsham site has now been more precisely defined. However, my submission remains that the concept of a further 200 units on this site, in addition to the 500+ units already destined to be built on the adjacent K2 site, is wrong, for the same reasons that I attempted to set out in May. The location is wrong. Furthermore, the Council's own core strategy background document demonstrates why it is wrong.

What now follows is a reproduction of the comments which I submitted in May. I submit that they remain valid for the purposes of this further Consultation:

The present position

1. Keynsham is already a crowded place, with infrastructure and transport links loaded to capacity. Even now, the large majority of residents travel to work outside Keynsham, primarily to Bath or (Greater) Bristol.
2. The roads (primarily the A4, but also including the A37 for access to central Bristol) are already chronically congested at peak times in both directions. The trains are infrequent, unreliable (albeit not as bad as a few years ago) and very crowded at peak times. The buses are infrequent, very unreliable and very slow. In addition to all of this, the transport links function only from the railway station; or the A4; or (for the slowest bus links) from central Keynsham. Travel to these points (in order to start any journey) is also chronically congested and public transport for this purpose is negligible.
3. The Green Belt area around Keynsham is a vitally important amenity not only for the residents of Keynsham, but also for the residents of Bristol as they travel out to the east and the residents of Bath as they travel out to the west. The areas in question are increasingly used and are relied upon for recreational purposes.
4. Keynsham already faces the prospect of large developments at Somerdale (700 units) and the K2 site at South West Keynsham (500 + units) – source: SPC 112. These developments alone will impose great strain on the Keynsham area.

The concept of still further development sites

5. The addition of still further development sites will impose enormous and potentially intolerable additional strain. There is an appearance of the Council using the Keynsham area as a “dumping ground” for the location of additional sites.
6. The overwhelming majority of still further residents will travel to work in either Bristol or Bath; the concept that new jobs will be created locally for more than a very few is wholly unrealistic.
7. The prospect of significant improvement to public transport services is small. In particular as to Keynsham railway station and the railway line between Bristol and Bath:
  - It already operates effectively to full capacity; and it is unrealistic to think that rail operators will provide either additional carriages or additional trains for the use of passengers over such a short distance on such a major line;
  - Off-peak services are very infrequent (about one per hour);
  - There are no facilities at all at Keynsham station, in particular no bus or taxi connections. The arriving passenger is stranded, if without a car;
  - Access to Keynsham train station is inherently difficult;

– Car parking is very limited and carries a very high risk of vandalism.

Other proposed sites

8. The Council considered a significant number of sites before arriving at the small selection of sites now being advanced in its “Schedule of Proposed Changes to the Submitted Core Strategy (March 2013)”. The writer has not sought to consider the sites distant from Keynsham. But there were six sites considered by the Council under the heading “Keynsham/Edge of Bristol”, as illustrated at Map 2 in Annex 1 to the Council’s “Core Strategy Background” document. Of these sites, it is submitted that South West Keynsham is demonstrably the worst suited. As Map 2 shows, it is distant from central Keynsham and distant from all transport links; it is the most prominent in terms of disturbance to the Green Belt, including (as the result of the absence of transport links) traffic implications in the immediately surrounding areas. Nor can it be justified simply on the basis that it is a mere addition to the imminent K2 site. To the contrary, the area already faces the task of absorbing 500+ new units and cannot be expected to absorb more.

9. For the above (outline) reasons, it is submitted that other sites considered and rejected by the Council are better suited – whether within the Keynsham area or (probably) beyond.

Specific objections to the South West Keynsham site

10. The following table is extracted from Annex 1 to the core strategy background document considered by the Council when assessing the various proposed sites and then selecting the particular sites now the subject of consultation. This Annex 1 sets out “the Council’s response to the concerns raised by the Inspector’s concerns regarding the approach to growth and housing in the Core Strategy” (see para.1.1 of the Annex).

11. The entries in the table relate exclusively to the additional South West Keynsham site, as now being proposed. The writer has highlighted a substantial number of the entries, which (it is submitted) well demonstrate the un-suitability of the site. Nor can the Council gainsay any of these points, which originate from its own document.

12. The writer has added additional observations, in italics.

13. Accordingly:

Social/Economic

- Avon Cycle Way provides a link to Saltford/Compton Dando to the south west of the site accessed via Redlynch Lane. Existing footpaths to the east of the site along the River Chew connect to Keynsham Health centre and on to the Town Centre. The Avon Cycle Way is a recreational Sustrans route which offers a semi-rural route to join the Bristol/Bath cycleway at Saltford. It is not and never will be a “cycle to work” route. The same applies to the footpaths (which anyway connect from the proposed site to the River Chew only via the most circuitous route, if at all). These factors cannot be “economic” matters.
- Site could incorporate an extension to the Community Woodland

Transport

- Has detractors on transport grounds because would bring traffic into already congested town centre, particularly travelling to Bath and north fringe of Bristol, with limited scope for mitigation. The words “limited scope” are not accepted; there would be no scope. And this point relates only to traffic into the town centre, without adding that the same traffic will then inevitably pass out of the town centre, to go to Bristol/Bath.
- Will lead to use of unsuitable minor roads to access Bristol by car, specific localised improvements may be necessary. Also the use of unsuitable minor roads to access Bath by car. There would be no significant scope for localised improvements. Nor is any outline (still less, detail) offered.
- Bristol bound traffic may also use the already congested A37 route. Agreed. It will do so in order to avoid the already congested A4 route.
- Poorly located for travel to Bath. Agreed: very poorly located. Exactly the same applies for travel to Bristol.
- Potential accessibility by public transport from the location is poor. Agreed. As stated earlier in this document, bus services are infrequent, very unreliable and very slow. No timetable is ever followed (presumably because of the traffic congestion on the A4 road)
- Not well linked to Keynsham station. Agreed. And see para.7 above in this document for the severe limitations following arrival at Keynsham station.
- Over 500m from the nearest local centre, 2km from the town centre and 3km from the railway station (all distances further than the recommended reasonable walking distance in the developers transport assessment). Agreed.

- This poses issues regarding the social and environmental sustainability of development of this site and could lead to the creation of an isolated and car-dominated environment.

The above factors would lead to the creation of an isolated and car-dominated environment. Even at this point, non-suitability is demonstrated on the face of the Council's own assessment.

#### Education

- Additional development of this scale may not be sufficient to support a new primary school, Castle Primary School is already being extended to its full capacity address additional demand from K2. It may be possible to expand existing primary school facilities.

The writer detects no provision (and no space) for a new school – which would anyway be purely conjectural. Accepting then that Castle Primary School will already be extended to its full capacity, the Council's assessment offers nothing beyond "a possibility to expand existing school facilities". Where? Presumably in the centre of Keynsham, distant from the development site.

#### Environmental

- The Green Belt in this location has an important role in protecting the countryside from encroachment, although not of great importance in preventing the merger of Bristol and Keynsham. Agreed that the Green Belt in this location has a (very) important role. But the suggestion that this location is not important for the prevention of the merger of Bristol and Keynsham misses the point. The area to the south of Keynsham is the only area of countryside adjacent to Keynsham; the open areas to the East north and west are not countryside as such.
- Records suggest the site supports limited features of ecological importance, with the exception of the presence of Great Crested newts, and Brown Hare, both are UK Priority Species. If confirmed through detailed surveys, measure to protect and sustain these species would be required.
- There is a degree of topographic continuity between the existing urban edge of Keynsham, the future K2 development sites and the northern part of this site.
- Good scope for structure planting to be moderately to highly effective in softening the impact on landscape and views north of Parkhouse Lane.
- Development of this site would not extend the southern limits of Keynsham any further south than that which already exists on the east side of Keynsham, or any further westwards than that which already exists. It is not accepted that this is either accurate or a significant point. The development would extend the southern boundary of Keynsham by the entire extent of the development, to the prejudice of the adjacent greenbelt areas. And it would extend Keynsham's housing still further away from Keynsham centre and transport facilities: see the (imprecise) plan attached to Annex 1.
- Physical separation would remain between Keynsham, Queen Charlton and Chewton Keynsham, although distances between them would inevitably be narrowed.
- Possible impact on Queen Charlton Conservation Area and Parkhouse Farm (Grade II listed)
- Prehistoric and medieval finds have been recovered from the central part of the area and could suggest early settlement and/or occupation.
- Overall capacity of the landscape to absorb development is low – area is deemed to be of high importance in landscape terms and development would have a high impact. Structure planting to the south of Parkhouse Lane would have some effect locally but largely ineffective from wider views. Agreed and important. The landscape would not absorb the proposed development. And the Council's earlier comment that there would be "good scope for structure planting to be moderately to highly effective in softening the impact on landscape and views north of Parkhouse Lane" is seen to be of small if any significance.
- Inspector of 1992 Keynsham and Chew Valley Local Plan recommended that the character and charm of the views from the Wellsway should be safeguarded carefully and that development on the west side of the Wellsway (i.e. including this site) would erode that character. Agreed and important.
- Within Flood Zone 1 and passes the sequential test. It also provides flexibility to respond potential brownfield delivery issues.

#### Delivery

- Landowners promoting land in this area for development at higher capacity than proposed.
- Could help to improve access difficulties with existing K2B allocation. However, there is no provision in the planning permission for K2B to allow for a vehicle connection to this site. This is an especially dangerous suggestion and is certainly not to be regarded as a factor in favour of the proposed development. To the contrary, such linkage would draw

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effectively the entire K2B traffic, which would then exit at Charlton Road, in addition to the traffic (a) already created by K2A and (b) (ex hypothesi) to be created by the still further site now being proposed. The traffic implications would be unacceptable.

- Capacity depends on how far south the site extends.
- Would require fairly significant sewerage infrastructure.

**Conclusions**

14. The proposed additional South West Keynsham site is not appropriate for development, in addition to the K2 development. Non-suitability is demonstrated on the face of the Council's own assessment.

15. In order to be suitable, development sites should be within reach of the likely workplaces (viz. Bristol/Bath) and should be supported by transport links and local facilities. The proposed East Keynsham site fulfils these criteria far better.

16. Finally, it is questioned whether the Council's figures add up: the proposed Core Strategy seeks 12,700 units, being an increase of 1,200 units above the total of 11,500 units previously proposed. The sites now under consultation would produce a total of 1,870 units. This total suggests an excess of 670 units over requirements.

**Change to the policy requested:**

17. The South West Keynsham site should be deleted.

<b>Respondent Number:</b> 4669	<b>Comment Number:</b> 2	<b>Respondent Name:</b>	<b>Respondent Organisation:</b> Compton Dando Parish Council
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>		<b>Attachments sent with the comment?</b> <input type="checkbox"/>	

**Change Reference:** CSA37 Land adjoining South West Keynsham

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**Support: 

Whilst we do support the Council's decision not to remove from the Green Belt or put forward for residential development land in the rural parish of Compton Dando, and to protect the visual amenity of the ridge above the River Chew, we object to any strategic housing allocation on the South West Keynsham site for the following reasons:

- The site is located away from the centre of Keynsham, with poor access to shops, railway station, doctors, schools etc, meaning an inevitable increase in the use of motor vehicles to access these facilities
- The site is on the bottom edge of the K2A and K2B sites, where more than 550 houses are already being built, on previously rural land. The effects of these developments are currently unknown. The cumulative effect is already to extend Keynsham's built up area out into the countryside on the edge of our rural parish, and the Chew Valley.
- The amendment proposes residential development only, with the implication that the residents of the 200 new houses (in addition to the 550 already being built) will commute to Bristol or Bath, or to new employment sites at Somerdale or East Keynsham some miles away.
- Traffic implications for the villages in our Parish are likely to be severe, especially with rat running through the villages to avoid congestion along the main routes, which are already some of the most congested in the country (see A37 and A4 into Bristol and Bath during peak hours), and with no prospect of imminent improvements to public transport or the road network. Furthermore, the access proposed for the South West Keynsham development will also open up access from the K2 sites to Charlton Road and thence through our villages on narrow rural lanes via the already dangerous Redlynch Lane junction. We note that policy KE4 lists off-site highway improvements required, but not at the junction of Redlynch Lane with Charlton Road.
- Although the amendment avoids building directly on the ridge above the Chew, the site is still on high land above the Chew Valley, with an adverse visual impact on the remaining Green Belt.

**Change to the policy requested:**

We suggest that the 200 houses proposed for South West Keynsham, if still deemed necessary, should instead be allocated to the East Keynsham site, in addition to the 250 already proposed there. This site is much better placed for access onto the main A4, and for schools (Chandag Junior school and Wellsway both within easy walking distance), and

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shops (the Cooperative, soon to become a Waitrose, at Broadmead). The East Keynsham site also includes employment opportunities, which South West Keynsham does not. The Schedule of Amendments itself recognizes that there is room for additional development at this site, as it proposes safeguarding further development land here. A total allocation of 450 houses at East Keynsham seems much more sustainable than adding 200 to the already-permitted 550 houses at K2 in South West Keynsham. The land at East Keynsham is also lower and less visible, and would have less adverse visual impact than further development above the Chew.

**Respondent Number:** 4993 **Comment Number:** 6 **Respondent Name:** Susan Jones

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA37 Land adjoining South West Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

With all the extra development on Charlton Road, this additional development will create a substantial amount of traffic. This will mean that the Redlynch Lane/Charlton Road junction, already difficult, will become almost impossible to come out of. Extra work would be needed there.

**Change to the policy requested:**

Add Redlynch Lane/Charlton Road junction to those that need improvement (in this case safety improvements).

**Respondent Number:** 5081 **Comment Number:** 1 **Respondent Name:** David Wragg

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA37 Land adjoining South West Keynsham

**Location:**

**Comment made on the Proposed Change:**

**Support:**

We are not against the principal of increased housing development, especially in the light of current increased demand. We are also sympathetic of the position of Bath & North East Somerset Council ("the Council") in the requirement to increase the housing stock in the Keynsham area. However, we are against the proposed amendment on the grounds of legality under principals 7a and 7b of the Town and Country Planning (local planning) (England) Regulations 2012, hereafter referred to as "the Planning Regulations". Our reasoning is as follows:

- 1) The Council has failed to publish all relevant key documents relating to the above. At Paragraph 13, there are vague references to highway improvements at the junction of St Ladoc Road and the A4175 Bristol Road, the junction of the A37 with Queen Charlton Lane and an indication that a new roundabout will be constructed on the junction of Charlton Road and the new access road onto the site of the proposed development. By failing to publish key details of these improvements, the Council has failed to meet the basic legal requirements of the Planning Regulations.
- 2) Furthermore, in the Sustainability Appraisal published in March 2013, the Council is required to ensure that their appraising policies reflect social, environmental and economic factors. We believe that the proposed amendment is not sustainable in that it ignores both the economic and social factors of the transport infrastructure impact. For example, the impact of increased traffic that the proposed development will create on the A4175/A4 junction at Hicks Gate, which is already at breaking point with traffic habitually queuing back from the junction past Keynsham Cemetery and this is before the impact of the existing new developments at Somerdale, Park Road and South West Keynsham are taken into account. In addition, the impact of increased traffic flow onto the A37, which is again habitually tailed back for several miles from the Maes Knoll Traffic lights towards Pensford.

3) There is already an unacceptable level of serious traffic accidents on Charlton Road generally and specifically in the area of the proposed development. Increasing the traffic flow further can only increase the dangerous accident rate.

4) There is currently a recurring incidence of severe flooding to the middle part of Parkhouse Lane adjacent to the existing properties in the area of Parkhouse Farm. The proposed development will certainly reduce the amount of water retention enjoyed by the existing field, leading to increased rainwater run-off into Parkhouse Lane.

5) The proposed development therefore does not comply with the sustainability requirements of the Planning Regulations as extended by the Sustainability Report of March 2013. Particularly the “major positive effects” objective 7 which suggests the changes to the core strategy, including this development in west Keynsham will “Ensure communities have access to a wide range of employment opportunities, paid or unpaid”. The transport implications of this development will not provide its residents with suitable access to employment making it unsustainable. This should have been identified in consultation with the Highways Agency during the production of the Addendum to the Sustainability Appraisal (March 2013).

6) Finally, we do not agree that the sporadic and haphazard nature of the proposed development is justified or appropriate in that it leapfrogs the community forest, which is a natural buffer between the existing urban area of Keynsham and the very important Green Belt.

As a result of the above, we believe that the Council has not complied with Questions 7a and 7b of the Planning Regulations in that it has failed to “objectively assess the development and infrastructure requirements” of the proposed amendment and the associated development.

**Change to the policy requested:**

**Respondent Number:** 5082 **Comment Number:** 1 **Respondent Name:** David & Heather Leverton **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA37 Land adjoining South West Keynsham

**Location:**

**Comment made on the Proposed Change:**

Support:

Whilst we support the Council’s decision not to change the Green Belt of land in Compton Dando parish and to protect the visual amenity of the ridge above the River Chew, we do object to any strategic housing allocation at South West Keynsham for the following reasons:

- The site is located away from the centre of Keynsham, with poor access to amenities, meaning an inevitable increase in the use of cars to access these facilities
- The site is on the edge of the K2A and K2B sites, where more than 550 houses are already being built, on previously rural land. The effects of these developments are currently unknown. The cumulative effect is already to extend Keynsham’s built up area into the countryside and the Chew Valley.
- The amendment proposes residential development only, with the implication that the residents of the 200 new houses (in addition to the 550 already being built) will commute to Bristol or Bath, or to new employment sites at Somerdale or East Keynsham some miles away.
- Traffic implications for Chewton Keynsham is likely to be severe, especially adding to the rat running through the village to avoid congestion along the main routes. The A37 and A4 (both ways) into Bristol and Bath during peak hours are already some of the most congested in the country. There is no prospect of significant improvement to public transport or the road network in the foreseeable future. The access proposed for the South West Keynsham development will also open up access from both K2 sites to Charlton Road and thence through our village on narrow rural lanes via the already dangerous Redlynch Lane junction.
- We note that policy KE4 lists off-site highway improvements required, but none at the junction of Redlynch Lane with Charlton Road, this is already an accident black spot in terms of ‘near misses’ it is only a matter of time before serious

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

accident statistics catch up with the danger.

Although the amendment avoids building directly on the ridge above the Chew, the site is still on high land above the Chew Valley, with an adverse visual impact on the remaining Green Belt.

### Change to the policy requested:

We suggest that the 200 houses proposed for South West Keynsham, if required, should instead be allocated to the East Keynsham site, in addition to the 250 already proposed there. This site is much better placed for access onto the main A4, with buses, schools (Chandag Infants & Junior Schools and Wellsway Secondary both within easy walking distance), and shops (the Cooperative/Waitrose, at Broadmead). The East Keynsham site also includes employment opportunities, which South West Keynsham does not. This is a much more sustainable environment. The Schedule of Amendments recognises that there is room for additional development at this site, as it proposes safeguarding further development land here. A total allocation of 450 houses at East Keynsham seems much more sustainable than adding 200 to the already-permitted 550 houses at K2 in South West Keynsham. The land at East Keynsham is also lower and less visible, and would have less adverse visual impact than further development above the Chew Valley.

## Change Reference: CSA38 Land adjoining South West Keynsham

**Respondent Number:** 239 **Comment Number:** 3 **Respondent Name:** Keynsham Civic Society

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA38 Land adjoining South West Keynsham

**Location:** Land adjoining East Keynsham

### Comment made on the Proposed Change:

**Support:**

KCS expresses concerns about:

- The impact on Abbots Wood;
- Safety implications of vehicular access onto Charlton Road;
- Problems resulting from the significant increase in traffic on Charlton Road;
- Potential loss of ancient trees and hedgerows.

### Change to the policy requested:

If the actual development does result in loss of habitat, then we would want to see legally binding biodiversity offset measures applied as part of the planning permission.

## Change Reference: CSA39 Land adjoining South West Keynsham

**Respondent Number:** 180 **Comment Number:** 11 **Respondent Name:**

**Respondent Organisation:** J S Bloor Ltd

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA39 Land adjoining South West Keynsham

**Location:**

### Comment made on the Proposed Change:

**Support:**

Whilst the change is supported i.e. the identification of land adjoining South West Keynsham as a site to be removed from the Green Belt, an objection is made to the fact that the area is limited to 200 dwellings. As has been shown in previous submissions, (A Sustainability Appraisal was prepared in December 2011 which demonstrated the sustainability credentials of the site and provided an assessment of the opportunities and constraints).

The Sustainability Appraisal contained an ecological, landscape and visual, archaeological and heritage, flood risk, transport and utilities at the site which established the baseline situation for the land against which the site's capacity to accommodate new development has been assessed.

Irrespective of the overall housing provision to BANES, an objection is made to the Council's assessment of the area in terms of its ability to accommodate further development both in this plan period and beyond as the plan also fails to address the issue of safeguarding. Any safeguarding potential is dismissed on the grounds that "The site allocation of land at KE4 uses all the suitable development land and the configuration of green Belt boundaries does not lend itself to identifying safeguarding land. Moreover, safeguarded land at Keynsham is already identified at East Keynsham".

Given that the Arup report identified development potential beyond that currently proposed it is considered that the Council's conclusions on safeguarding are inconsistent with its evidence base. Furthermore objections have already been made to CSA 34 which identifies land to the East of Keynsham for safeguarding.

The Arup report "South of K2 Development Concept Options Report" suggests a more extensive area for development than that which has been included in the Schedule of Amendments to the Core Strategy ( see pages 20 – 21). The Arup Report includes 3 options only in Option 3 is such a restrictive approach taken to the development of the site. In both Options 1 and 2 they "attempt to maximise the developable area while taking into account constraints". Option 1 according to the Arup analysis could accommodate approximately 989 dwellings (according to Arup the net figure would be 777 dwellings {there are arithmetical errors in the Table for Option 1}), while Option 2 (which is a more access driven strategy) could accommodate 700 dwellings (560 dwellings net). Both options would require highways improvements, but given the scale of development this would be anticipated.

It should be noted that the Arup Report referred to above states that the "supply and demand of residential land are finely balanced at present across the West of England. An upturn in activity would see a land shortage with consequent upward pressure on land values across BANES as a whole."

Accompanying reports produced by FMW provide a critique of the following documents which are part of the Council's evidence base:- B&NES Core Strategy Transport Evaluation, Development Concept Options Report, Sustainability Appraisal and comments on the transport related points of the Schedule of Core Strategy Amendments. The FMW report provides a summary of the key components of the Transport Strategy presently envisaged to accompany development at South West Keynsham.

With maximum development on the site, Bloor Homes would be willing to fund junction improvements at the A37/ Queen Charlton Lane and Bristol Road/ St. Ladoc Road/ Trescothick Close. Improvements include junction signalisation with pedestrian crossing facilities which will significantly increase capacity from that currently available. The need for these improvements is already identified in the Schedule of Core Strategy Amendments.

Pedestrian and cycle connections to K2 and along the eastern side of Charlton Road are proposed as part of the development, which will connect in with proposed provision of pedestrian and cycle routes on Charlton Road as part of K2a development. These would assist and encourage additional trips on foot and by cycle for those travelling to and from the site.

The level of highway impact from development at south west Keynsham will be dispersed more widely than that proposed at east Keynsham. Trips to Bristol and South Gloucestershire are likely to route via the A37, to Bath via Redlynch Lane, Wellsway or Keynsham town centre. Development at East Keynsham will lead to significantly more traffic using the A4 towards these key employment areas.

The close proximity of development at East Keynsham to the strategic highway network is also more likely to incentivise residents in to using their cars to travel to work even though there are existing bus services along this route. This is evidenced by the car trip generation data for Keynsham East Ward compared to Keynsham South Ward. Therefore, modal shift away from the car towards public transport would be significantly greater from development at south west Keynsham than for east Keynsham.

Development at south west Keynsham will produce less CO2 emissions per dwelling than development at east Keynsham. This is particularly important to Keynsham as the town centre is an AQMA.

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An exemplar Travel Plan would be produced to support development at south west Keynsham that will include a number of incentives to encourage sustainable travel.

### Change to the policy requested:

The extent of land removed from the Green Belt should be increased to reflect the development potential of the site, as has been show in the Arup Report a larger site could be allocated in this location and the issue of safeguarded land can and should be addressed.

The FMW consulting report concludes that South West Keynsham is the most appropriate location for residential development and with development of 945 units, a primary school and community facilities it will encourage sustainable travel within the site and with neighbouring residential areas. Public transport trips, particularly for home to work trips will be encouraged with the introduction of a frequent bus service connecting the site with Keynsham town centre and railway station. Furthermore, impacts on the highway network will be spread more evenly across the network including the A37, Wellsway/A39 and A4 via the town centre. Junction improvements have been identified to mitigate against forecast highway impacts at the A37/ Queen Charlton Lane, Charlton Road/ Wollard Lane and Bristol Road/ St. Ladoc Road.

**Respondent Number:** 275 **Comment Number:** 10 **Respondent Name:** Redrow Homes South West

**Respondent Organisation:**

**Agent ID:** 164 **Agent Name:** DLP Planning Consultants

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA39 Land adjoining South West Keynsham

**Location:** Land adjoining South West Keynsham

### Comment made on the Proposed Change:

Support:

Land west of Keynsham at Lays Farm is not included.

The extent of the 'alternative option' identified on the plan at Annex 3 at Lays Farm, and identified with a potential capacity of 50 dwellings is based on wholly erroneous information as to the nature and position of a gas main shown on the (unnumbered) plan attached to the SHLAA and referred to by Arup in its review of Green Belt. This does not accord with the records held by Wales and West Utilities Ltd who own and operate the pipeline. The actual route of the pipeline runs some 100 metres further to the west (Ref: W&WU Pipeline Plan and letter from W&WU dated 12.06.2013 and attached at Appendix A to the Landscape and Visual Appraisal).

The impact of the existing pipeline on the development potential of the site is consequently minimal and certainly not such that would warrant disregarding it completely as a sustainable option. Moreover, it is feasible to divert the main, and Redrow have recently done just that elsewhere in Bristol, and by using modern materials it would further reduce any no-build easement to 6m.

This inaccurate information appears to have been the principal reason for Arup dismissing the land at Lays Farm as a serious option for release from the Green Belt, without properly assessing the scope for development here having regard to the purposes of Green Belt and in particular: preventing neighbouring towns merging into one another (i.e. Keynsham and Bristol); and preserving the setting and special character of historic towns (in this case, the Queen Charlton Conservation Area).

The site, south of Lays Farm (Ref: Area 10 BANES Sustainability Appraisal Report Annex L) is bound on two side by development and forms a far more logical addition to the built-up area of Keynsham than that proposed to be released from the Green Belt to the south (Ref: Area 13 BANES Sustainability Appraisal Report Annex L).

The Site is located adjacent to Charlton Road as it enters Keynsham from the south. It occupies an area of approximately 7.8 ha and is currently given over to pasture. Its northern and eastern boundaries are formed by built form, with its southern and western boundaries being rural in nature.

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There is currently no public access onto the Site, although a well-used footpath runs along its southern boundary. There are no significant landscape features on the Site, other than the hedgerows which form the field boundaries.

The Site sits at an elevation of 72.5m AOD to 59.5m AOD, and is broadly flat in nature, sloping slightly downwards to its eastern boundary with Charlton Road.

The Site's landscape and visual relationship with its surroundings is primarily with the landscape of the Charlton Valley and Stockwood to the west.

The Site sits within the LCA5 'Dundry Plateau' of the Rural Landscape of Bath and North East Somerset, a rural Landscape Character Assessment and has an 'open' character, typical of this area.

The visual appraisal (attached) showed that the Site is partially visible from several locations to the west, but generally within the context of existing built form.

BANES has, through its consultants, Arups, reviewed the Green Belt gap between Keynsham and Stockwood and identified and noted the easternmost field on the Lays Farm Site as potentially suitable for development. This area is outlined as part of Alternative Option KM3 in Annex 3 of the Schedule of Core Strategy Amendments - November 2013.

Arups' West Keynsham Development Concept Options Report (March 2013), should be reviewed, as it placed an existing high pressure gas main inaccurately on the Lays Farm Site, and also incorrectly presumed an overly wide easement zone associated with it. The incorrect location of this main heavily influenced Arups' 'Developable Area' which has fed through into the Schedule of Core Strategy Amendments.

In light of these inaccuracies the Site was revisited and the reappraised with particular consideration being given to: (1) Potential visual impact across the Charlton Valley; and (2) The setting of Queen Charlton (Conservation Area).

The landscape development strategy for the Site (see attached) has evolved out of the findings of the landscape and visual appraisal and the now correctly located, high pressure gas main. The proposal is to introduce development into the north-eastern part of the Site, set back from the western boundary and to introduce a significant strip of structure planting that is complementary to that which is found in the locality.

The introduction of a robust, defensible edge would ensure that in the long term the setting of Queen Charlton and the character of the Charlton Valley are not adversely affected by the introduction of development. Similarly the 'rounding off' of development in this south-eastern corner of the town, and the inclusion of the woodland strip would ensure that the separate identities of Keynsham and Queen Charlton are preserved as well as ensuring that there would not be a future coalescence with Stockwood to the west.

As such we do not believe development on the Site would compromise the purposes of the Green Belt (Ref: NPPF Para 80) with particular reference to preventing Keynsham merging with Bristol and preserving the historic setting and special character of Queen Charlton.

As a consequence of the above, the Site should be considered for inclusion within the land to be removed from the Green Belt and allocated for up to 150 dwellings.

### Change to the policy requested:

Amend notation on Proposals Map to indicate release of land at Lays Farm, west of Keynsham (See attached Plan) with the potential to deliver up to 150 dwellings.

**Respondent Number:** 3494 **Comment Number:** 1 **Respondent Name:** Andrew Wait

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA39 Land adjoining South West Keynsham**Location:****Comment made on the Proposed Change:**Support: 

I support this change as it gives better access to the site and produces a clear boundary which will, hopefully, make future development at this location more difficult.

**Change to the policy requested:****Change Reference: CSA42****Respondent Number:** 2564 **Comment Number:** 18 **Respondent Name:****Respondent Organisation:** Waddeton Park Limited**Agent ID:** 128 **Agent Name:** Peter Brett Associates**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA42**Location:** Comment on multiple Strategic Sites**Comment made on the Proposed Change:**Support: 

18. The plan appears to set up a mechanism for sites of around 50 dwellings to come forward at each of the villages. This is to be done through the allocation of sites in the Placemaking Plan. However, there is no similar mechanism within the plan or in these amendments for these kinds of sites to be bought forward on the end of Bath. This is a major omission from the plan which means highly deliverable medium sized sustainable sites in accessible locations which meet the needs of the population of Bath and contribute to housing the workers within the city are not being released. The failure of the plan to recognise the contribution these types of sites can make to the sustainable growth of the city is a significant failing and one which goes to the heart of the plan making process demonstrating that the plan is unsound because it is not justified. The plan has failed to properly assess all reasonable alternatives, based on proportionate evidence, and as such it fails the 'justified' test of soundness as set out in paragraph 182 of the NPPF.

**Change to the policy requested:****Respondent Number:** 4803 **Comment Number:** 8 **Respondent Name:** Simon Steel-Perkins**Respondent Organisation:** Waddeton Park Limited**Agent ID:** 128 **Agent Name:** Peter Brett Associates**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA42**Location:****Comment made on the Proposed Change:**Support: 

18. The plan appears to set up a mechanism for sites of around 50 dwellings to come forward at each of the villages. This is to be done through the allocation of sites in the Placemaking Plan. However, there is no similar mechanism within the plan or in these amendments for these kinds of sites to be bought forward on the end of Bath. This is a major omission from the plan which means highly deliverable medium sized sustainable sites in accessible locations which meet the needs of the population of Bath and contribute to housing the workers within the city are not being released. The failure of the plan to recognise the contribution these types of sites can make to the sustainable growth of the city is a significant failing and one which goes to the heart of the plan making process demonstrating that the plan is unsound because it is not

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

justified. The plan has failed to properly assess all reasonable alternatives, based on proportionate evidence, and as such it fails the 'justified' test of soundness as set out in paragraph 182 of the NPPF.

**Change to the policy requested:**

**Change Reference: CSA44**

**Respondent Number:** 0 **Comment Number:** 20 **Respondent Name:** Multiple

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA44

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

These sites are all clearly unsuitable and have more to do with B&NES making up housing numbers for the Core Strategy as can be clearly demonstrated by the Council labelling Whitchurch Village as "edge of Bristol" and allocating 200 houses for a village with only 450 approx homes. No where else has a village of this size been allocated such a large housing figure and the fact remains that Bristol City Council have clearly stated that they do not wish large development on their SE Boundary at Whitchurch Village.

**Change to the policy requested:**

I would expect to see this figure of 200 to be reduced to 50 in line with all the other villages within the Core Strategy (bearing in mind the village has already seen Barratt Homes gain permission for 47 houses already).

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 5 to this schedule.]

**Respondent Number:** 0 **Comment Number:** 14 **Respondent Name:** Multiple

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA44

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

Throughout the whole process of this Core Strategy, Whitchurch Village was an RA1 village to accept 50 houses over some 20 years.

Now we find we are a RA5 and have to take 200 houses. This is a quite unfair burden upon the community

**Change to the policy requested:**

We ask that this figure be reduced significantly to say 50 - 100 houses to be more in line with other villages and that our status of "edge of Bristol" be removed and reverted to that of all the other named villages.

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 4 to this schedule.]

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**Respondent Number:** 0 **Comment Number:** 8 **Respondent Name:** Multiple

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA44

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

Throughout the whole process of this Core Strategy, Whitchurch Village was an RA1 village to accept 50 houses over some 20 years.

Now we find we are an RA5 and have to take 200 houses. This is a quite unfair burden upon the community.

**Change to the policy requested:**

We ask that this figure be reduced significantly to say 50-100 houses to be more in line with other villages and that our status of "edge of Bristol" be removed and reverted to that of all the other named villages. To compensate for this small loss of housing figures other smaller villages might welcome more development for regeneration.

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 3 to this schedule.]

**Respondent Number:** 86 **Comment Number:** 3 **Respondent Name:**

**Respondent Organisation:** Whitchurch Parish Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA44

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Whitchurch Parish Council does not agree with the amendments.

**Change to the policy requested:**

**Respondent Number:** 170 **Comment Number:** 7 **Respondent Name:** Robert Hitchins Ltd

**Respondent Organisation:**

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA44

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Whilst the principle of releasing land from the Green Belt at Whitchurch is supported, an objection is made to the site allocated in Policy RA 5 and also to the fact that any safeguarded land is to wait to be considered as part of the Core Strategy Review. This approach is inconsistent with the NPPF para 83 and 85 which states that "Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to the intended permanence in the long term, so that they should be capable of enduring beyond the plan period." My emphasis.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

“where necessary, identify in their plans areas of safeguarded land between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period.”

It is clear from BNES 47 para 2.28 that the Council accepts that 200 dwellings is not the maximum capacity of this location. The environmental and Green Belt assessments also indicate that the capacity in this location could be greater than 200 dwellings and that the capacity of 200 dwellings is not led by transport impacts/considerations.

**Change to the policy requested:**

See comments on CSA 45 which should be amended and reflected in CSA 44

**Respondent Number:** 428 **Comment Number:** 1 **Respondent Name:** Susan Wilkes **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA44

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Throughout the whole process of this Core Strategy, Whitchurch Village was an RA1 village to accept 50 houses over some 20 years.

Now we find we are an RA5 and have to take some 200 houses. This is a quite unfair burden upon the community.

**Change to the policy requested:**

We ask that this figure be reduced significantly to say 50 – 100 houses to be more in line with other villages and that our status of “edge of Bristol” be removed and reverted to that of all the other named villages. To compensate for this small loss of housing figures other smaller villages might welcome more development for regeneration.

**Respondent Number:** 4926 **Comment Number:** 6 **Respondent Name:** Cllr Peter Edwards **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA44

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Whitchurch Parish Council does not agree with the amendments .

**Change to the policy requested:**

## Change Reference: CSA45 Land adjoining Whitchurch

**Respondent Number:** 0 **Comment Number:** 9 **Respondent Name:** Multiple **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA45 Land adjoining Whitchurch**Location:** Land adjoining Whitchurch**Comment made on the Proposed Change:**Support: 

We do not think Bath & North East Somerset Council has consulted with Bristol City Council as required by new Planning Guidelines. Bristol City Council agreed unanimously to object to such developments due to use of Green Belt Land and extra traffic.

We do not agree with any change of Green Belt here

**Change to the policy requested:**

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 4 to this schedule.]

**Respondent Number:** 0      **Comment Number:** 15      **Respondent Name:** Multiple

**Respondent Organisation:**

**Agent ID:**      **Agent Name:**

**Further Information available in the original comment?**       **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch**Location:** Land adjoining Whitchurch**Comment made on the Proposed Change:**Support: 

I do not agree with land being removed from Green Belt at Whitchurch Village. The Green Belt is the only thing that stops Whitchurch Village from being submerged in urban sprawl. Your Council should listen to its neighbouring authority, Bristol City Council, who has said categorically that there is no need for such development at Whitchurch. Bristol City Council recognises that such development would be 100% commuters, 90% going to Bristol thus increasing already congested traffic and 10% maybe to Bath.

The NPPF clearly states that there is a duty to co-operate which clearly B&NES Council have not done with Bristol CC and therefore the Core Strategy is not Spatial.

**Change to the policy requested:**

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 5 to this schedule.]

**Respondent Number:** 0      **Comment Number:** 3      **Respondent Name:** Multiple

**Respondent Organisation:**

**Agent ID:**      **Agent Name:**

**Further Information available in the original comment?**       **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch**Location:** Land adjoining Whitchurch**Comment made on the Proposed Change:**Support: 

We do not think Bath & North East Somerset Council has consulted with Bristol City Council as required by new Planning Guidelines. Bristol City Council agreed unanimously to object to such developments due to use of Green Belt Land and extra traffic as such sites would produce 100% commuters of which 90% would go to Bristol causing further congestion. There is a duty to co-operate within the NPPF and Bath & North East Somerset Council are not doing so with Bristol City Council.

Should not have Green Belt status removed. Infrastructure cannot cope. Schools full, no employment, no Post Office, no NHS dentist, A37 congested. Development here would be unsustainable and unwanted by Bristol City Council

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 3 to this schedule.]

**Respondent Number:** 86**Comment Number:** 4**Respondent Name:****Respondent Organisation:** Whitchurch Parish Council**Agent ID:**      **Agent Name:****Further Information available in the original comment?**       **Attachments sent with the comment?** **Change Reference:** CSA45 Land adjoining Whitchurch**Location:****Comment made on the Proposed Change:****Support:** 

Whitchurch Parish Council does not agree that Whitchurch Village should be a Policy RA5 village with development of up to 200 dwellings.

Whitchurch Village should be a RA1 village with up to 50 dwellings in line with other villages in the area and in accordance with the original status afforded to the village.

Whitchurch Parish Council and the residents of Whitchurch Village were never consulted on this change and feel as though they are being discriminated against.

No benefit will be gained by B&NES Council building 200 dwellings in this area as most people will work, shop and use the services in Bristol, as there are no transport links from Whitchurch to Bath.

B&NES have confirmed that there is no policy/logic in proposing this number of dwellings for Whitchurch Village, it was the residual number of houses to be placed somewhere.

Do not agree that land should be removed from the Green Belt for this purpose when the whole purpose of Green Belt is prevent urban sprawl and retain the identify of the village.

From a questionnaire delivered to each of the 490 homes in the village the overwhelming majority of our village support these views and DO NOT want this proposed development.

The Government state that their policy is one of localism and it would be entirely wrong if it does not listen to the views of local people.

**Change to the policy requested:****Respondent Number:** 93**Comment Number:** 6**Respondent Name:** Highways Agency**Respondent Organisation:****Agent ID:**      **Agent Name:****Further Information available in the original comment?**       **Attachments sent with the comment?** **Change Reference:** CSA45 Land adjoining Whitchurch**Location:** Land adjoining Weston (General)**Comment made on the Proposed Change:****Support:** 

The site-specific placemaking principles in respect of transport are broadly supported. The reference to Sulis Manor (which is located within the Odd Down I South Stoke strategic site allocation) in para 3 should presumably be deleted. It would be helpful to the reader if the location of the new roundabout mentioned in para. 7 was identified. The policy should recognise that the nearest bus stops for services on the Wells Road appear to be those on either side of the Queen

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

Charlton Lane and that it may be appropriate to seek contributions for, and better connections to, these stops., rather than those in Whitchurch Village proper.

**Change to the policy requested:**

**Respondent Number:** 170 **Comment Number:** 8 **Respondent Name:** Robert Hitchins Ltd

**Respondent Organisation:**

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:**

**Comment made on the Proposed Change:**

Support:

An objection is made to Policy RA 5 in terms of the site allocated as shown on the Key Diagram and Policies Map.

In Annex O Green Belt Site Allocations Sustainability Appraisal ref CD10/A1/3 only area F ie land off Stockwood Lane, Whitchurch relates well to the existing village and the local centre and other local facilities and services including bus routes.

An objection is made to the Sustainability Appraisal that “Development in Areas A, F and the northern part of E would impact on the separate identity of the village and could lead to merging of the settlement which has a negative effect on promoting stronger more vibrant and cohesive communities.”

The additional evidence provided by the addendum to the LVIA confirms that not all of Land Area F is required to maintain reasonable separation of settlements and that some of the area could be suitable for an extension to Whitchurch Village. This contradicts the key summary comments in the Sustainability Appraisal Report Annex O.

The assessment of Area E ie the area in which the proposed allocation is located is detached from the centre of Whitchurch. It is clear from the assessment summary point 3 (page 37 Annex O) that “development in Areas B, C, D and outer parts of E and A does not relate well to the existing village and the Local Centre and other local facilities and services including bus routes.”

Yet the Addendum to the Sustainability Appraisal (DC10/A1/1) states under Objective 1 that “The site assessment (Annex O) helped to identify the area most accessible to facilities and services in Whitchurch.” The site allocated is not considered to be the most accessible.

The assessment also states that the area has potential to support local charity Horseworld which is referred to as enabling development, but this should not be a justification for removing land from the Green Belt.

The proposed allocated site is too remote to provide a playing field for the Whitchurch Primary School, whereas site F allows Whitchurch Primary School to expand to respond to increasing need for primary school provision.

In the Arup Options Report, land off Stockwood Lane, Whitchurch was included in each of the 3 Options considered, whereas the proposed site was only included in 2 of the Options ( i.e. Options 2 and 3).

Option 1 takes a conservative approach and clusters development at modest extensions to Whitchurch village, intended to generate critical mass at Whitchurch village and support existing infrastructure and minimise the impact on the Green Belt and retain the separation of Whitchurch from the suburbs of Bristol. Land off Stockwood Lane fits within this Option. Arup conclude that this option will have a relatively low impact on strategic infrastructure and will require limited access points which can be obtained from existing through roads.

Option 2 maximises development over a larger developable area and assumes the availability of Horseworld. Option 3 is a

derivation of Option 2 and assumes that the land at Horseworld would not come forward for development.

Area F Land off Stockwood Lane, Whitchurch (was registered as Fields North of Orchard Park, Staunton Lane, Whitchurch) and has been subject to appeal (October 2013) ref APP/F0114/A/13/2199958.

An objection is made to the Council's assessment of site F, it is not considered to be the areas of greatest green belt harm.

A critique of the BANES Whitchurch Landscape and Visual Assessment has been prepared by MHP Chartered Landscape Architects to support the representations on behalf of Robert Hitchins Ltd. The report demonstrates that the decision making process is flawed as the outcomes reflected in proposed Policy RA5 do not reflect the logical outcomes supported by key evidence. In summary, the MHP report confirmed that the proposed allocation of the Horseworld areas (part of Land Area E) is not justified in landscape and visual terms when consideration is given to both the existing and new evidence base. The evidence base confirms that land north west of Staunton Lane (Land Area F) is more appropriate for allocation on the basis that it would result in less significant effects of development. In addition, the development of land north west of Staunton Lane (Land Area F) would maintain a strong and robust Green Belt boundary at Whitchurch. The key evidence that supports this assessment is summarised as follows:

i. The BANES Landscape and Visual Assessment Summary (August 2013 CD9/LV/6) identifies overall landscape sensitivity of Land Area F to be Medium. The overall landscape sensitivity of the Horseworld area (part Land Area E) is identified as Medium to High through to High sensitivity. New evidence provided by the Addendum to Landscape & Visual Impact Assessment: Whitchurch (October 2013 CD10/E11) does not provide reliable evidence to change the original findings.

ii. The BANES Landscape and Visual Assessment Summary identifies the main site features (hedgerows and trees) of Land Area F to be Medium Sensitivity. The hedgerow and trees of the Horseworld area (part Land Area E) are identified to be Medium to High sensitivity. New evidence provided by the Addendum to Landscape & Visual Assessment: Whitchurch (October 2013 CD10/E11) confirms the importance and sensitivity of the natural features on the Horseworld area.

iii. Land Area F and Horseworld area have not been equally reassessed on effects on or potential for strategic green infrastructure. This has led to a flawed reassessment of landscape sensitivity preventing fair site comparison and inclusion of unsupported comments in the key summary comments in the Sustainability Appraisal Report Annex O.

iv. Land Area F and Horseworld (Area E) area are not equally reassessed on impact on public rights of way. This has led to a flawed reassessment of landscape sensitivity preventing fair site comparison and resulting in a change in landscape sensitivity along an arbitrary line which is unsupported by any additional evidence.

v. The additional evidence provided by the addendum to the LVIA confirms that not all of Land Area F is required to maintain reasonable separation of settlements and that some of the area could be suitable for an extension to Whitchurch Village. This contradicts the key summary comments in the Sustainability Appraisal Report Annex O.

vi. An assessment of potential cumulative effects has not been undertaken for the proposed allocation site or alternative option sites at Whitchurch.

New evidence from BANES (the Addendum to the LVIA October 2013 ref CD10/E11) has confirmed that the retention of the existing open space between Whitchurch and Stockwood is not essential to the distinctness of the settlements and that a lesser gap would be sufficient to maintain reasonable separation thus subject to this Land Area F would be suitable for an extension to Whitchurch village.

The cumulative effects of development of the Horseworld area would create a weak boundary to the Green Belt whereas development within Land Area F would retain a strong and robust Green Belt boundary.

A transport assessment has also been prepared to support the representations.

Area F has been demonstrated to be a suitable area to be removed from the Green Belt, and will provide a new defensible boundary to the Green Belt, both through the recent inquiry and also through the Arup Concept Options Report.

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The allocated site should be replaced with site WH1 which is one of the alternative options. WH1 has been demonstrated through the preparation of a planning application and the evidence given at appeal to be an area suitable for removal from the Green Belt and a sustainable location to accommodate development needs in the plan period. It is available and deliverable and can contribute to meeting the 5 year land supply shortfall.

**Respondent Number:** 279 **Comment Number:** 8 **Respondent Name:** Rohan Torkildsen

**Respondent Organisation:** English Heritage

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**Support: 

Change ref: CSA45 Strategic Allocation Whitchurch Placemaking Principles  
Placemaking Principal No.6, "Development causing substantial harm to designated heritage assets.....should be avoided".

Unfortunately this also fails to recognise policy in the NPPF (paragraph 132-134) which emphasises that "great weight should be given to the assets conservation . The more important the asset, the greater the weight should be."

**Change to the policy requested:**

To accord with the NPPF this Placemaking Principal No.6 could be modified as follows "Development should ensure the conservation of the significance of affected heritage assets..."

Mindful of the advice in the Heritage Assets Study (CD9/LV/1) could I suggest that an additional bullet point is added to either Placemaking Principal No.5 or 6 to ensure a detailed archaeology assessment is carried out to inform the proposed masterplan.

**Respondent Number:** 356 **Comment Number:** 1 **Respondent Name:** Pete Goodwin

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**Support: 

If there has to be further development at Whitchurch (and it's a big IF) this is probably the site that is least damaging to the Green Belt and the general impact on the village.

That said, it would depend on absolute confidence that public and private investment would be available to fully compensate for the very real problems development would bring.

The private car traffic generated would have to be minimised by real improvements in alternatives, particularly all-day buses and potentially a new Park & Ride. The net impact should be to reduce car and lorry traffic.

Commuter traffic patterns into Bristol are likely to change with the roll-out of Residents' Parking Zones and with the completion of the South Bristol Link Road – both of them likely to generate more orbital trips on unsuitable roads within the Bristol built-up area. The Link Road is also likely to attract more heavy lorries. New development at Whitchurch would add further to these new problems

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The A37 junctions with Staunton Lane and with Sleep Lane are both in desperate need of relief, while Sleep Lane itself is already totally inadequate for the traffic it carries. If new housing were built to the east (HorseWorld) side of Sleep Lane, it would be an opportunity to reroute the Sleep Lane traffic along a new road (though not a residential one). However, it's hard to make any sense of the traffic impact assessment that rules out green belt sites west of the A37 while accepting those east of the A37; the only significant difference seems to be in that, for the latter, some traffic is exported via Stockwood Lane and becomes Bristol's problem!

There will also have to be confidence that plenty of school places would be available locally, and that adequate health services would be available and easily accessible.

Finally, if there is a real housing need to be met (not just a marketing opportunity for spec building) there has to be confidence that developers can be held to providing a full quota of affordable housing and other contributions to local infrastructure.

These were among the issues that ruled out HorseWorld's own proposals to 'develop' its visitor centre site, and they would certainly need to be addressed before any green belt land is released at Whitchurch

**Change to the policy requested:**

Either – removal of the proposal

Or - strong conditions and assurances that funds will be available (and in this context it doesn't mean public funds) to provide the service infrastructure – schools, health services, public transport – to ensure that the impacts of development will benefit both Whitchurch and neighbouring wards, including Bristol's Stockwood, Hengrove, and Whitchurch Park.

**Respondent Number:** 409 **Comment Number:** 1 **Respondent Name:** Angela Sims

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

During the last 8 – 10 weeks we have had replacement sewer works and alterations to sleep lane in place.

The sewer work we knew must be done.

The sleep lane work for the new builds has highlighted the already severely congested traffic problems of the A37. How if all these planned homes are built will this be coped with. Greenbelt is greenbelt & should stay that way & we do not agree with someone overturning this fact. The countryside is fast disappearing anyway and should be for all to enjoy. When we purchased our home it was advertised as overlooking green fields. I do not believe the reason for all these houses being built here are because they are needed. If so build them on brown belt sites, of which there are plenty to choose from. But of course that would less profit for fat cat developers having to cleanse & prepare them.

**Change to the policy requested:**

**Respondent Number:** 428 **Comment Number:** 6 **Respondent Name:** Susan Wilkes

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA45 Land adjoining Whitchurch**Location:****Comment made on the Proposed Change:**Support: 

We do not think Bath & North East Somerset Council has consulted with Bristol City Council as required by new Planning Guidelines. Bristol City Council agreed unanimously to object to such developments due to use of Green Belt Land and extra traffic as such sites would produce 100% commuters of which 90% would go to Bristol causing further congestion. There is a duty to co-operate within the NPPF and Bath & North East Somerset Council are not doing so with Bristol City Council.

We do not agree with any change of Green Belt here.

**Change to the policy requested:****Respondent Number:** 604 **Comment Number:** 1 **Respondent Name:** Mr Raymond Stone**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA45 Land adjoining Whitchurch**Location:** Land adjoining Whitchurch**Comment made on the Proposed Change:**Support: 

CSA15 Do not agree – reasons below.

CSA16 Strongly disagree with the Strategic Green belt release for 200 homes in Whitchurch village.

CSA44 Do not agree.

CSA45 Do not agree that Whitchurch should be a policy RA5 village with up to 200 new homes. Other villages have an allocation of 50 and need them to maintain their status. We are being very unfairly treated. We do not want a strong connection to the city of Bristol. We shall lose our identity and there will be a built up sprawl for miles. Bristol City even do not want this increase near them for it increases their problems.

CSA46 & CSA47 Do not agree

Go slowly about 30 & 40 houses every decade. We feel BANES devalues this village on the extremity of their boundary.

**Change to the policy requested:****Respondent Number:** 810 **Comment Number:** 2 **Respondent Name:** PN & J Britten**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA45 Land adjoining Whitchurch**Location:** Land adjoining Whitchurch**Comment made on the Proposed Change:**Support: 

We do not agree with land being removed from Green Belt at Whitchurch Village. The Green Belt is the only thing that stops Whitchurch Village from being submerged in urban sprawl. Your Council should listen to its neighbouring authority, Bristol City Council, who have said categorically that there is no need for such development at Whitchurch. Bristol City Council recognises that such development would be 100% commuters, 90% going to Bristol thus increasing already

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congested traffic and 10% maybe to Bath.

The NPPF clearly states that there is a duty to co-operate which clearly B&NES Council have not done with Bristol CC and therefore the Core Strategy is not Spatial.

CSA 46 Should remain as Green Belt.

CSA 47 This land should not be removed from the Green Belt. Removing it from GB is presumably to make way for housing development which is inappropriate here. The Infrastructure cannot cope. A37 is already congested, primary school oversubscribed, no NHS Dentist or Post Office, very limited local employment all of which render any such development as unsustainable particularly with reference to the first paragraph of this letter. In fact B&NES Planning Committee have recently refused a planning application for 125 houses at this site for the above reasons so it seems illogical therefore that B&NES should seek to remove this land from GB

These sites are all clearly unsuitable and have more to do with B&NES making up housing numbers for the Core Strategy as can be clearly demonstrated by the Council labelling Whitchurch Village as "edge of Bristol" and allocating 200 houses for a village with only 450 approx homes. No where else has a village of this size been allocated such a large housing figure and the fact remains that Bristol City Council have clearly stated that they do not wish large development on their SE Boundary at Whitchurch Village.

We would expect to see this figure of 200 to be reduced to 50 in line with all the other villages within the Core Strategy (bearing in mind the village has already seen Barratt Homes gain permission for 47 houses already)

**Change to the policy requested:**

**Respondent Number:** 810 **Comment Number:** 1 **Respondent Name:** PN & J Britten

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

Support:

We do not agree with land being removed from Green Belt at Whitchurch Village. The Green Belt is the only thing that stops Whitchurch Village from being submerged in urban sprawl. Your Council should listen to its neighbouring authority, Bristol City Council, who have said categorically that there is no need for such development at Whitchurch. Bristol City Council recognises that such development would be 100% commuters, 90% going to Bristol thus increasing already congested traffic and 10% maybe to Bath.

The NPPF clearly states that there is a duty to co-operate which clearly B&NES Council have not done with Bristol CC and therefore the Core Strategy is not Spatial.

CSA 46 Should remain as Green Belt.

CSA 47 This land should not be removed from the Green Belt. Removing it from GB is presumably to make way for housing development which is inappropriate here. The Infrastructure cannot cope. A37 is already congested, primary school oversubscribed, no NHS Dentist or Post Office, very limited local employment all of which render any such development as unsustainable particularly with reference to the first paragraph of this letter. In fact B&NES Planning Committee have recently refused a planning application for 125 houses at this site for the above reasons so it seems illogical therefore that B&NES should seek to remove this land from GB

WH1 This area should not be on the Alternative Strategic Site List. This Green Belt land is the very thing that stops

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Whitchurch Village from merging with Stockwood forming one big urban sprawl. B&NES has already refused planning for 300 houses at this site so again it seems ludicrous for the Council to now consider releasing this land from GB. Bristol CC have objected to any such development – please see first paragraph above. Infrastructure inadequate – A37 already congested, no Post Office, no NHS Dentist, primary school oversubscribed, no local employment .

WH2 The Green Belt land should not be on the Alternative Strategic Site List. The A37 already at capacity and is unsuitable for all the reasons mentioned above.

These sites are all clearly unsuitable and have more to do with B&NES making up housing numbers for the Core Strategy as can be clearly demonstrated by the Council labelling Whitchurch Village as “edge of Bristol” and allocating 200 houses for a village with only 450 approx homes. No where else has a village of this size been allocated such a large housing figure and the fact remains that Bristol City Council have clearly stated that they do not wish large development on their SE Boundary at Whitchurch Village.

We would expect to see this figure of 200 to be reduced to 50 in line with all the other villages within the Core Strategy (bearing in mind the village has already seen Barratt Homes gain permission for 47 houses already)

**Change to the policy requested:**

**Respondent Number:** 811 **Comment Number:** 1 **Respondent Name:** Mary Walsh, Jill Britten **Respondent Organisation:** WHITCHURCH VILLAGE ACTION GROUP

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

Support:

We set out below why we do not agree with the suggested amendments.

CSA46 Should remain as Green Belt.

CSA47 This land should not be removed from the Green Belt. Your Council have recently refused a planning application on this land so there can be no logic to the removal of the Green Belt status. The Infrastructure cannot cope – A37 already congested, lanes through to Stockwood already carrying too much traffic, local primary school oversubscribed, no Post Office, no NHS Dentist, Dr. Surgery too far to walk to when ill, very limited local employment. Bristol City Council do not want such development on their SE Boundary as it would produce 100% commuters, 90% to Bristol. This is about producing housing figures for a Core Strategy and not about local need. NPPF states that there is a duty to co-operate with neighbouring authorities and clearly B&NES have not done this therefore the Core Strategy is not Spatial.

Bath & North East Somerset Council has not adhered to the NPPF which clearly states that there is a Duty to Co-operate with neighbouring authorities and to ensure that the Core Strategy is “spatial”. Bristol City Council has unanimously objected to any such large scale development on their SE border. There is no need of urban extension here and they recognise that any such development will be 100% commuter with 90% going to Bristol and 10% to Bath. The reason for the housing figures here at the Village is only to satisfy county housing figures. There seems to be a total lack of co-operation with Bristol City Council.

We would further draw your attention to the fact that the village has been called the derogatory “edge of Bristol” name with RA5 status with the extraordinary figure of 200 houses dumped here.

We would like to see the proposed housing figure of 200 reduced to say 50-100 to be in line with all the other villages of RA1 status so that this village has not been discriminated against. There is no justification for dumping 200 houses on Whitchurch Village and not on say, Clutton, Bishop Sutton, Temple Cloud or wherever. Any shortfall in housing figures

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caused through removal of the 200 to say 50/100 houses could be made up by offering smaller villages the chance to have small development thus allowing these little villages a chance for some regeneration and allow them to “live”.

We have asked to speak at the Inspectors next hearing and look forward to highlighting the above.

**Change to the policy requested:**

**Respondent Number:** 837 **Comment Number:** 17 **Respondent Name:** David Redgewell

**Respondent Organisation:** TFGB South West Transport

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Whitchurch / Stockwood area of BANES adjoin the City and County of Bristol. Providing green buffers.can be left between Stockwood / Whitchurch, Keynsham and Brislington.

200 new homes is under supplying the need for affordable housing to rent and to meet BANES housing need of 4000 / 5000 on the waiting list.

South Bristol is about to improve the Rapid Bus network Metro bus and the South Bristol link Hengrove to Long Ashton. Metro Bus Hengrove City centre to Bradley Stoke Emerson Green.

**Change to the policy requested:**

**Respondent Number:** 837 **Comment Number:** 18 **Respondent Name:** David Redgewell

**Respondent Organisation:** South West TFGB Transport Network

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:**

**Comment made on the Proposed Change:**

**Support:**

New housing in South Bristol Hospital and College allows Whitchurch and Stockwood to take more homes with bus links Hengrove Hospital, Whitchurch Village, Keynsham station or Bath Bus Station.

Extra jobs and employment need to be created in the South Bristol area / North East Somerset at Whitchurch / Stockwood employment land needs allocating to prevent community by the Ring Road via Keynsham to the north road and traffic congestion. Including the Duty to Cooperate South Gloucestershire / North Somerset with Bristol City Council.

**Change to the policy requested:**

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**Respondent Number:** 837 **Comment Number:** 5 **Respondent Name:** David Redgewell **Respondent Organisation:** South West Transport Network Railfuture TFG1  
**Agent ID:** **Agent Name:**  
**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch  
**Location:**

**Comment made on the Proposed Change:**  **Support:**

We would like to see further Housing Association in the Whitchurch Stockwood village but with the provision of Green Belt lungs between Whitchurch village and Stockwood.

**Change to the policy requested:**   
 Much more housing could be allocated on the A37 with 376 Showcase 379 to Radstock, Shepton Mallet and Bath.  
 Bus route every 30 minutes to Farrington Gurney, Wells, Glastonbury and Street via Pensford with a new bus service to Keynsham, Charlton Road new development Keynsham town centre and railway station.

**Respondent Number:** 837 **Comment Number:** 19 **Respondent Name:** David Redgewell **Respondent Organisation:** Railfuture South West Network Transport for  
**Agent ID:** **Agent Name:**  
**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch  
**Location:**

**Comment made on the Proposed Change:**  **Support:**

We would like to see with good urban design and quality open space more housing allocation in the Whitchurch / Stockwood village area of BANES.

To meet the housing allocation land within the National Planning Framework and Sustainable Development to meet the 4000 – 5000 people on the BANES housing waiting list for affordable and rental housing.

The location is close to jobs in South Bristol, Hengrove Hospital and college and Filwood Business Park Regeneration area with good public transport, bus services developed to Keynsham from Whitchurch Hospital New Development sites and good Showcase bus routes on the A37.

**Change to the policy requested:**

**Respondent Number:** 2028 **Comment Number:** 1 **Respondent Name:** Mr & Mrs Gurton **Respondent Organisation:**  
**Agent ID:** **Agent Name:**  
**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch  
**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**  **Support:**

We concur fully with comments sent to you by The Whitchurch Parish Council and The Whitchurch Village Action Group.

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Whitchurch Village has 490 homes.

Surprisingly, a new development of a further 47 dwellings within our Village (currently under construction) is not mentioned in the statistics for new development.

The Green Belt surrounding our village is under attack from many sources. From developers who have purchased agricultural land, Horse World who wish to sell off part of their present land for private development and an illegal Gypsy-Traveller site.

Should Green Belt status ever be removed from around our village, this could open the flood gates to massive development, more than doubling the size of our village.

The suggestion for the construction of 200 more dwellings is disproportionate and unfair compared to the size of our village.

The suggestions would KILL OUR VILLAGE. Whitchurch Village would cease to exist and our fears are that it would just be swallowed up in the urban spread and become part of Greater Bristol.

**Change to the policy requested:**

**Respondent Number:** 2611 **Comment Number:** 3 **Respondent Name:** **Respondent Organisation:** Transition Bath

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

Transition Bath strongly supports the proposed Sustainable Construction Standards at all the sites. We feel that building to these higher standards will reduce future carbon emissions, occupiers' exposure to rising fuel costs and their volatility, reduce fuel poverty and overall is a very sensible economic policy.

The monetised energy savings to home owners easily offset the additional capital costs, which are not borne by the developers but by the sellers of the land. Recent land sales of greenfield and brownfield sites in Bath at £1.9M and £2.5M per hectare are significantly above the government's viability benchmark levels of £300K and £800K per hectare suggest that the additional capital costs of between £6.5K and £10.5K (ref 1) of building to Code for Sustainable Homes 5 which have significantly reduced in the last few years will not act as a barrier to land being brought forward for development.

A recent survey by Curo for the redevelopment of the ex-MOD site at Foxhill in Bath where 700 homes are to be built put Sustainable Low Energy homes as the second top priority for local residents after Affordable Homes; we feel the requirement for building homes more sustainably is backed by the majority of B&NES residents.

Ref 1: [http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/EP059%20Costs%20of%20building%20to%20the%20Code%20for%20Sustainable%20Homes%20\(Sept%202013\)%20\(draft\).pdf](http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/EP059%20Costs%20of%20building%20to%20the%20Code%20for%20Sustainable%20Homes%20(Sept%202013)%20(draft).pdf)

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4335 **Comment Number:** 2 **Respondent Name:** Mr Neil Fountain**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA45 Land adjoining Whitchurch**Location:** Land adjoining Whitchurch**Comment made on the Proposed Change:**Support: 

This is another example of creeping urbanisation that is destroying the green belt separation of communities, in this case with a particular impact on the conservation area of Queen Charlton. The highway infrastructure is already inadequate for current vehicle usage around the A37 / Queen Charlton Lane - Sleep Lane junction, this proposal will only serve to exacerbate the problem - resolving it properly would cost significantly more than any value obtained from the development itself.

**Change to the policy requested:****Respondent Number:** 4438 **Comment Number:** 4 **Respondent Name:** Richard Dean**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA45 Land adjoining Whitchurch**Location:****Comment made on the Proposed Change:**Support: 

The allocation of 200 homes for Whitchurch is too great; with the impact on the village likely to cause an over stretch on services and further congestion to roads in particular the A37. The lack of secondary schools, facilities and jobs in the local area will mean that occupiers of these proposed 200 homes will inevitably have to travel some distance to access secondary schools, jobs and services.

Whilst we appreciate that some housing is required and that Bath & North East Somerset are required to provide a certain number of houses, and the loss of any green belt is regrettable, there are other strategic sites that are positioned to take housing in greater numbers and with generally less impact than the effect such a development would have on Whitchurch village.

There are currently 47 homes being built in Whitchurch and this must be taken in to consideration by reducing the 200 proposed dwellings accordingly. The allocation for Whitchurch should be reduced to 100 maximum.

The site is in an area located on part of the current Horse World site and it must not only consider the impact of the new homes, but also the impact of the increase in visitor numbers and service vehicles to the rebuilt Horse World site which will be adjacent. With this in mind it is evident that the roads and general position of the site is not conducive to 200 homes and the number should be reduced in favour of better positioned sites such as the one at East Keynsham.

The reduction of numbers to 100 would also mean that the current site used by Horse world, would not be changed so drastically meaning that much of the homes would be positioned on the current commercial site, saving green fields in Whitchurch.

With the problems of access to and from both the proposed homes and the Horse World site, access to the site should be considered very carefully, including consideration given not only to a pedestrian link to Queen Charlton Lane, but also whether it would be viable to have vehicle access to help with the problem of dispersing traffic quickly and efficiently.

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Some thought might also need to be given to the possibility of linking across to Woollard Lane or the A37 or both. Sleep Lane, one of the access points to this proposed development, has little scope for improvement, given the retention of hedge rows and trees as indicated, and the current position of the listed buildings which must stay.

**Change to the policy requested:**

In consideration of my above statement in box 7, I would propose that the number of houses for Whitchurch be reduced to 100 homes. This would mean that with a reduction on numbers you would not require so much green belt land and your plan to change the green belt could be reduced and accordingly reduce impact.

**Respondent Number:** 4438 **Comment Number:** 3 **Respondent Name:** Richard Dean  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

The allocation of 200 homes for Whitchurch is too great, with the impact on the village likely to cause an over stretch on services and further congestion to roads in particular the A37. The lack of secondary schools, facilities and jobs in the local area will mean that occupiers of these proposed 200 homes will inevitably have to travel some distance to access secondary schools, jobs and services.

Whilst we appreciate that some housing is required and that Bath & North East Somerset are required to provide a certain number of houses, and the loss of any green belt is regrettable, there are other strategic sites that are positioned to take housing in greater numbers and with generally less impact than the effect such a development would have on Whitchurch village.

There are currently 47 homes being built in Whitchurch and this must be taken in to consideration by reducing the 200 proposed dwellings accordingly. The allocation for Whitchurch should be reduced to 100 maximum.

The site is in an area located on part of the current Horse World site and it must not only consider the impact of the new homes but also the impact of the increase in visitor numbers and service vehicles to the rebuilt Horse World site which will be adjacent. With this in mind it is evident that the roads and general position of the site is not conducive to 200 homes and the number should be reduced in favour of better positioned sites.

With the problems of access to and from both the proposed homes and the Horse World site, access to the site should be considered very carefully, including consideration given not only to a pedestrian link to Queen Charlton Lane, but also whether it would be viable to have vehicle access to help with the problem of dispersing traffic quickly and efficiently. Some thought might also need to be given to the possibility of linking across to Woollard Lane or the A37 or both. Sleep Lane, one of the access points to this proposed development, has little scope for improvement, given the retention of hedge rows and trees as indicated, and the current position of the listed buildings.

**Change to the policy requested:**

In consideration of my above statement in box 7, I would propose that the number of houses for Whitchurch be reduced to 100 homes.

**Respondent Number:** 4438 **Comment Number:** 1 **Respondent Name:** Richard Dean  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** CSA45 Land adjoining Whitchurch**Location:** Land adjoining Whitchurch**Comment made on the Proposed Change:**Support: 

The allocation of 200 homes for Whitchurch is too great, with the impact on the village likely to cause an over stretch on services and further congestion to roads in particular the A37. The lack of secondary schools, facilities and jobs in the local area will mean that occupiers of these proposed 200 homes will inevitably have to travel some distance to access secondary schools, jobs and services.

Whilst we appreciate that some housing is required and that Bath & North East Somerset are required to provide a certain number of houses, and the loss of any green belt is regrettable, there are other strategic sites that are positioned to take housing in greater numbers and with generally less impact than the effect of such a development would have on Whitchurch village.

There are currently 47 homes being built in Whitchurch and this must be taken in to consideration by reducing the 200 proposed dwellings accordingly. The allocation for Whitchurch should be reduced to 100 maximum.

The Land adjoining East Keynsham has only been allocated 250 new homes, yet this area has excellent position to service both Bristol and Bath and offers many of the services that are lacking in Whitchurch. On the concept diagram, land has been safeguarded in pink for future building. This land could be released now allowing an increased number of houses in the land adjoining East Keynsham area of say an extra 100 homes, increasing the current 250 to 350, in doing so, this would provide the allocation required and enable the burden on Whitchurch to be reduced.

The area of land adjoining East Keynsham does have its own congestion problems on the A4 and the loss of green belt is always regrettable, however the position of the proposed development is far better than that which is proposed in Whitchurch. There are both secondary and primary schools within walking distance. There is nearby employment and the proposal to extend employment floor space within the use 'Classes B1 (b) & (c), B2 and B8 north of the A4 as shown on the concept diagram'. There is a superstore within walking distance and the access points to the A4 would offer greater scope for improvement than the Whitchurch development. There is also, to be taken into account, that Keynsham is a town rather than a village and offers many more services and facilities within easy reach of the East Keynsham strategic site.

An extra 100 houses on the East Keynsham site would have far less impact than forcing 200 homes in the village of Whitchurch.

**Change to the policy requested:**

In consideration of my above statement in box 7, I would propose that the number of houses for Whitchurch be reduced to 100 homes and the proposed homes for Keynsham be increased from 2,150 to 2,250.

**Respondent Number:** 4604 **Comment Number:** 2 **Respondent Name:****Respondent Organisation:** Barratt Homes Bristol**Agent ID:** 176 **Agent Name:** Nathaniel Lichfield & Partners**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA45 Land adjoining Whitchurch**Location:** Land adjoining Whitchurch**Comment made on the Proposed Change:**Support: 

Barratt Homes strongly agrees with the principle of releasing the proposed land area for residential development.

Whilst there are limitations to each of the potential sites at Whitchurch, the proposed strategic allocation poses the most sustainable opportunity when balancing key factors such as highway, ecological, landscape, visual and heritage impacts.

Notwithstanding this, there are a number of objections raised to the details of the policy set out in the Core Strategy

Amendments (November 2013) document.

The Policy requires the provision of 40% affordable housing on this strategic allocation.

This is in stark contrast to the 30% affordable housing requirement sought for the BS14 0 postcode (i.e. the wider village). There is no justification for this deviation from policy and there is no new evidence produced to support the November 2013 consultation to explain the 33% increase over the general Whitchurch village requirement. Nor is there evidence that demonstrates that this is viable in this location.

The policy must be based upon a robust evidence base. There is no evidence to justify such a significant departure from the Core Strategy requirement for the remainder of the local authority area. Without this evidence, the policy is unsound.

#### Masterplan

The Policy requires the preparation of a masterplan that has been subject to public consultation. Barratt Homes welcomes this coherent approach, providing the owners of Horseworld are prepared to collaborate in this process. This is also on the assumption that planning permission for Horseworld is not granted in advance of any Masterplanning process either by the Local Planning Authority, or through the appeal process. Barratt Homes would like to be clear that that the consultation would relate to design and layout rather than questions about whether the site should be developed, per se. Barratt Homes would also be concerned if the Masterplanning process was derailed and caused an unreasonable delay in the delivery of dwellings in this location. This is set in the context of a lack of 5 year housing land and the requirements of the NPPF.

#### New Playing Field

Recognising that the provision of additional dwellings within the village will create a demand for primary school places and that the existing school is reaching capacity, development at the strategic allocation should provide a contribution towards these places where it is viable to do so.

Barratt Homes notes the proposed requirement for the relocation of a playing field to enable the expansion of the primary school. The requirement for this has been identified in response to the evidence base document 'Education Requirements for the Sites' (November 2013). This document is a statement of apparent requirement and does not give full evidence for arriving at the conclusion. It is not clear exactly how the increased places will create the need for a new playing field. Nor does it take into account whether other means of delivering such a playing field have been or will be considered.

Without a robust evidence base, the demands of the policy that sets out the proposal for the strategic allocation should not be included. Without this evidence, the policy is unsound.

#### Early Years Facility

Barratt Homes notes the proposed requirement for an Early Years Facility on site. The requirement for this has been identified in response to the evidence base document 'Education Requirements for the Sites' (November 2013). However, this document is a statement of apparent requirement and does not give a methodology for arriving at the conclusion that a new facility will be required on site. Specifically, the documents does not:

- a) Give a calculation to show how the 30 places sought has been reached;
- b) Set out details demonstrating that there is not sufficient capacity within Whitchurch to accommodate an increased population; and
- c) Discuss why the facility would have to be on site and not better developed in a more central location or alongside other education establishments.

Without a robust evidence base, the demands of the policy that sets out the proposal for the strategic allocation should not be included. Without this evidence, the policy is unsound.

#### Code for Sustainable Homes

The policy includes a proposed requirement to meet CfSH Level 5 from 2014. This is a higher requirement than Policy CP2 in the Core Strategy Proposed Modifications (March 2013) which seeks CfSH Level 4 from 2013 and Zero Carbon from 2016.

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The policy must be based upon a robust evidence base. There is no evidence to justify such a significant departure from the Core Strategy requirement for the remainder of the local authority area. Without this evidence, the policy is unsound.

### Carbon Dioxide Emissions

The policy for the strategic allocation also sets out the need to reduce carbon dioxide emissions from expected energy use in buildings by at least 20%. This once again departs from the Core Strategy approach for the remainder of the district where no target has been set.

The policy must be based upon a robust evidence base. There is no evidence to justify such a significant departure from the Core Strategy requirement for the remainder of the local authority area. Without this evidence, the policy is unsound.

### Vehicular Access

The policy for the strategic allocations states that the principal vehicular access will be sought from Staunton Lane and Sleep Lane. Technical work undertaken by Entran on behalf of Barratt Homes demonstrates that a safe vehicular access can be achieved via Queen Charlton Lane. The policy must explicitly state that additional vehicular access points will be acceptable.

As explained earlier in this representation, Barratt Homes has an interest in the land identified in Plan IL31089\_01-001 with the remainder of the strategic allocation under the control of at least one other party. By restricting vehicular access through the plan document in this way, the local planning authority is creating a ransom situation whereby, the Barratt Homes land could only be accessed if rights are granted by the other owner(s).

The policy as set out creates an unacceptable position. The purpose of identifying land in the greenbelt to be released for residential development to meet the significant step change in housing delivery needed to meet the requirements identified in the Strategic Housing Market Assessment. By creating a ransom the local planning authority is effectively sterilising the Barratt Homes land and putting at significant risk the realisation of the strategic allocation.

This does not need to be the case.

A safe vehicular access can be created from Queen Charlton Lane as set out in Plan SK01 enclosed with these representations. The plan recognises the landscaping role that the tree line along Queen Charlton Lane has and therefore proposes a carefully designed access/egress that minimises the need to remove vegetation along this boundary. This is balanced with the need to have alternative access points to the strategic allocation.

### Summary

Whilst the principle of the strategic allocation is supported, some of the policy requirements are onerous and will restrict development being brought forward in the short term. Given the context of a lack of 5 year land supply and the delays to the adoption of the Core Strategy, the policy must enable, facilitate and support the delivery of housing in a timely manner rather than stifle it. There is no evidence to support the increased demands of the policy beyond what was contained in in the Core Strategy.

As such, the Policy is unsound and it should be amended in accordance with the proposed changes set out in Section 8 of this form.

### Change to the policy requested:

#### Affordable Housing

Policy point 3 should be reworded: (to include 30% affordable housing) of around 200 dwellings, in the plan period. The site should be developed at an average density of 35-40dph (with the exception of Sulis Manor).

#### Masterplan

Policy point 2 should be reworded to:

Preparation of a coherent masterplan, which will be subject to public consultation, will be required. This requirement would cease should any part of the site be granted planning permission in isolation.

The masterplan should ensure that the strategic allocation is well integrated with the existing village and provides links to south Bristol.

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## Early Years Facility

Policy point 8 should be reworded to:

Contributions will be required to facilitate the expansion of Whitchurch Primary School to meet the needs arising from the additional dwellings. Where it is demonstrated that a new playing field is required to meet this need, a contribution towards the provision of a new playing field, in a suitable location close to the

school to enable expansion will be sought. Contributions will also be sought to meet additional need for an Early Years Facility created by residential development on this site. Preference is given to the delivery of an on-site facility where the need for this can be demonstrated.

## Code for Sustainable Homes and Carbon Dioxide Emissions

Policy point 9 should be removed so that it is consistent with the remainder of the Core Strategy.

## Vehicular Access

Policy Point 7, first bullet point should be amended to:

Provide vehicular access and junction enhancements to facilitate principal access to the site from Staunton Lane and Sleep Lane (linking to the new roundabout). A vehicular access from Queen Charlton Lane will also be allowed where it can be demonstrated that a safe access can be achieved.

**Respondent Number:** 4654 **Comment Number:** 1 **Respondent Name:**

**Respondent Organisation:**

**Agent ID:** 157 **Agent Name:** Origin3

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**Support: 

## 1. Introduction

1.1 These representations to the Bath & North East Somerset Council's Core Strategy Proposed Amendments are made by Origin3 Ltd on behalf of Sir Michael Gregory with regard to his land interests (hereafter referred to as the Gregory land) off Queen Charlton Lane, Whitchurch. A site location plan is attached at Appendix 1.

1.2 The representations are submitted in response to the public consultation running from 11th November to 20th December 2013. The formal amendments to the Core Strategy to which these representation relate, follow the Council's earlier consultation on proposed changes following the Core Strategy Inspector's recommendations. In summary, broad locations were identified where the Council proposed to remove land from the District's Green Belt in order to accommodate the identified housing needs of the District. The Council intended to confirm such allocations via the 'Place Making Plan' but following concerns raised by the Core Strategy Inspector it was deemed appropriate to clarify and crystallise the additional development sites for the Core Strategy examination.

1.3 As such, to help address the Core Strategy Inspector's requirements, the Council has now ratified its preferred locations for necessary Green Belt releases to meet the housing needs of the District for the emerging plan period. In this regard, Green Belt releases are required to enable additional housing growth at:

- Odd Down/South Stoke;
- Weston;
- East Keynsham;
- South West Keynsham; and
- Whitchurch

1.4 These representations have specific regard to the proposed amendment in relation to the allocation at Whitchurch for 200 homes. The identified allocation at Whitchurch includes the Gregory land along with Horseworld and a third party

land owner (Wilcox land). My client supports the proposed allocation and confirms that the land illustrated at Appendix 1 remains available, suitable and deliverable for development.

1.5 These representations also set out that the Horseworld/Gregory/Wilcox land remains the most sustainable residential growth option for the Whitchurch area and Green Belt release.

## 2. Relevant Planning History

2.1 The extent of my clients land ownership is illustrated at Appendix 1. It comprises two grassed paddocks contained by mature hedges. The site is surrounded by dispersed residential settlement and neighbouring paddocks which are also identified within the proposed allocation. The Horseworld site is located to the immediate north of the site. Access to the site is gained via a track off Queen Charlton Lane which leads directly onto the nearby Bristol Road (A37).

2.2 Policy SPC14 of the submitted Core Strategy identifies the need to release land from the Green Belt in sustainable locations in order to accommodate the increased requirements for growth. SPC24 identifies new locations for growth including Whitchurch. SPC146 introduced a new policy RA5 which relates to the removal of land at Whitchurch from the Green Belt by the 'Placemaking Plan' in order to provide development of around 200 dwellings. As highlighted above, the intention to clarify the Whitchurch allocation via the 'Placemaking Plan' has been superseded by the local plan Inspector's recommendation that the Core Strategy should provide greater certainty on the additional allocation sites. The current consultation update provides further detail of the proposed allocation at Whitchurch in this regard with a concept diagram and the principles for the development allocation set out under Policy RA5.

2.3 The site has also been positively assessed by the SHLAA and other assessments as part of the Core Strategy evidence base, including landscape, ecology, arboriculture and highway considerations.

2.4 Origin3 has previously submitted representations to the relevant consultation stages of the Core Strategy process in respect of land at Whitchurch with regard to the Gregory land. These representations confirmed the site's availability and suitability for residential development.

## 3. The Proposed Whitchurch Allocation

### Proposed Policy RA5

3.1 The general principles of the proposed policy RA5 are supported.

3.2 The affordable housing requirement (RA5, paragraph 1) should be flexible to react to issues of viability and up to date information on local housing need during the plan period (i.e. updated SHMA).

3.3 The objective relating to the preparation of the comprehensive masterplan (RA5, paragraph 2) for the site is supported.

3.4 The draft policy requirement for Green Infrastructure (RA5, paragraph 3) is also supported as a general requirement for the proposed development. However, the concept diagram is not underpinned by a comprehensive assessment of the site and existing vegetation and trees. The concept diagram is somewhat crude and bisects the site with a green corridor thereby restricting opportunities for linkages and the wider provision of green infrastructure across the entire development site. The proposed allocation needs to be properly masterplanned with a comprehensive understanding of opportunities and constraints. In this regard, the key diagram could prejudice the proper masterplanning of the site. The concept diagram should therefore be amended to remove the green infrastructure corridor and leave this to the proper and evidence based masterplanning of the site.

3.5 The policy objective to promote new Public Rights of Way (RA5, paragraph 4) is supported but may also be prejudiced by the concept diagram as highlighted above.

3.6 The policy requirement to retain and protect existing trees and hedgerows (RA5, paragraph 5) is premature without a detailed assessment of such existing features to understand their quality and health. The policy should be amended to state that existing features will be retained 'where possible and/or where appropriate'.

3.7 In respect of access (RA5, paragraph 7), the draft policy should also identify opportunities for a secondary vehicular

access onto Queen Charlton Lane. It is considered the Queen Charlton Lane is both suitable and has capacity to accommodate a level of traffic from the proposed allocation development. The Core Strategy highways assessment should robust test this opportunity to properly inform the concept diagram.

3.8 It should be noted that there are two paragraph 7s in the draft policy RA5, as above relating to access and also below relating to Sustainability.

3.9 The requirement for Level 5 Code for Sustainable Homes (RA5, paragraph 7) to be achieved from 2014 is likely to become out of date early in the life of the Plan as changes to other guidance and regulations (such as building regs) take place. It is the specific nature of the policy with reference to Code for Sustainable Homes is likely to cause conflict in future especially as the plan should endure for the next 15+ years. It is therefore suggested that the policy is used to guide development rather than require specific actions against guidance/ standards that may be withdrawn in future and that building regulations are used as the tool for ensuring building performance standards are achieved.

#### Concept Diagram

3.10 The proposed concept diagram in the consultation paper illustrates a landscape corridor running north/south through the centre of the proposed allocation site. The proposed landscape corridor is not supported by any robust evidence base and is considered illogical. It has been designated without any proper assessment of the site. As such, the entire proposed allocation site should be identified for residential development without landscape corridor areas indicated. Appropriate levels of open space, green infrastructure and landscaping should be provided across the development site and determined via a proper masterplanning exercise to ensure opportunities to enhance landscape, ecology and biodiversity are maximised with the development.

Furthermore, the proposed retained vegetation as illustrated on the concept diagram would conflict with a comprehensive masterplan which would seek to promote ease of movement throughout the development site. Indeed, if this green corridor was imposed on the masterplan for the development it would prejudice the design of the scheme and effectively subdivide the site into two parcels. As such, additional vehicular access points would be necessary.

#### Sustainable Location

3.11 The proposed allocation at Whitchurch provides an opportunity to provide sustainable development growth at a location where it can be best served by local amenities and accessibility to local shops and services. The site benefits from its immediate proximity to Whitchurch village centre via Staunton Lane. The site also benefits from ease of access to the wider Bristol urban area by sustainable modes. The site therefore has very good accessibility to the abundant variety of social and recreational amenities and facilities, including health and education services, and employment opportunities.

3.12 Having regard to environmental constraints generally, the Horseworld/Gregory/Wilcox land provides the most sustainable growth option at Whitchurch. This has been confirmed by the Core Strategy Evidence base. The site is contained by existing residential development on its north, east and west boundaries, and Queen Charlton Lane and the A37 provide strong visual buffers to the open countryside beyond, to the south of the allocation site. As such, it provides a logical and sensitive growth location without compromising the fundamental functions of the strategic Green Belt in the wider locality.

#### Landscape

3.13 The site is un-extraordinary in landscape terms. It comprises a number of self-contained paddocks with well-established hedge boundaries. The site is visually contained from the wider landscape by a combination of existing vegetation and development. This assessment has been confirmed by the Council's own landscape study.

3.14 Overall, landscape and visual impact constraints within the site are limited. That much is confirmed by the Core Strategy evidence base having regard to Green Belt and the general landscape impact of development. A masterplanning exercise that is informed by a detailed landscape and visual impact assessment, can ensure a comprehensive and appropriate landscape strategy for the development.

#### Highways and Accessibility

3.15 The proposed allocation at Whitchurch is inherently sustainable given its proximity to local shops, services and public transport facilities. The site benefits from existing walking/cycling links and opportunities to improve linkages to local facilities within Whitchurch village.

3.16 Whitchurch currently benefits from good local bus services, including school services. These are summarised below and there are bus stops within walking distance of the proposed allocation site:

Service Number: 376

Calling At: Bristol Temple Meads, Whitchurch, Pensford, Clutton, Farrington Gurney, Chewton Mendip, South Horrington, Wells

Frequency: Mon – Sat (every 30 mins), Sun – (every 60 mins)

Operator: First (Badgerline)

Service Number: 379

Calling At: Radstock, Midsomer Norton, Paulton, Farrington Gurney, Clutton, Whitchurch, Bristol Temple Meads

Frequency: Mon – Sat (every 60 mins)

Operator: First (Badgerline)

Service Number: 636

Calling At: Whitchurch, Stockwood, Keynsham

Frequency: Tuesdays (Daily) Friday (Daily)

Service Number: 460

Calling At: Whitchurch, Bristol (Rookery Farm), Hengrove, Bishopsworth, Bristol (Highridge Green) Chew Magna (Chew Valley Comprehensive School)

Frequency: School Service

Operator: Abus

Service Number: 134

Calling At: Knowle, Whitchurch, Stockwood, Brislington, Keynsham, Longwell Green, Kingswood (John Cabot Academy)

Frequency: School Service

Operator: South Gloucestershire

3.17 With respect to vehicular access to the development site, appropriate access points with the required visibility splays can be designed off Staunton Lane, Sleep Lane and Queen Charlton Lane.

3.18 Furthermore, there is ample capacity on the local highway network to support the proposed allocation. The Council's own assessment (Transport Access Assessment for Core Strategy Greenfield Site Allocation – October 2013) provided an assessment of capacity on the local highway network and confirmed that an allocation of up to 300 units could be delivered at the Whitchurch proposed allocation (Horseworld/Gregory/Wilcox land) without the need for any substantial highway infrastructure improvements.

#### Flooding & Drainage

3.19 Reference to the Environment Agency's Flood mapping illustrates that the site is not located in an identified area of flood risk in respect of Rivers/Coastal or surface water. The landowners are not aware of any historic flooding issues on the site.

3.20 The development of the proposed allocation can come forward with a comprehensive scheme of SUDS to ensure no increased floodrisk arises from the development site.

#### Ecology

3.21 Detailed ecological assessments of the site have not been undertaken. However, given the historic nature of the site as grazing paddocks, the site is unlikely to provide much suitable habitat for protected species. Bats may use the site for foraging but the site provides limited opportunities for roosting in terms of buildings. The presence of badgers is possible, but could be appropriately mitigated for within significant open/space or wildlife areas as part of the masterplanning exercise of the site. A high quality development proposal can promote biodiversity enhancement.

#### Alternative Sites

3.22 The proposed allocation at Whitchurch on the Horseworld/Gregory/Wilcox land is supported. It provides the most

sustainably located and logical site for Green Belt release without compromising the strategic function of the Green Belt in the wider site locality.

3.23 The site has a strong physical and functional relationship with Whitchurch village and the wider urban area to the north. Furthermore, the site is contained by existing settlement to the north, east and west. The site is also visually contained from the open countryside to the south by the existing vegetation along Queen Charlton Lane and the A37 (Bristol Road).

3.24 Land to the south of the A37 is considered less appropriate for development owing to its relationship to the open countryside. The Council's evidence base including landscape assessments confirms that the Horseworld/Gregory/Wilcox land is the most sustainable growth site in the Whitchurch area.

#### 4. National Planning Policy Considerations

4.1 As the Core Strategy emerges with the need to identify strategic development sites including the Whitchurch allocation, it is prudent to assess how the candidate sites perform against the requirements of National Planning Policy.

4.2 The Coalition Government published the National Planning Policy Framework on 27th March 2012 to provide an overhaul of the planning system. The Framework introduces a presumption in favour of sustainable development; seeks to boost significantly the supply of housing; and requires local authorities to take a positive approach to development in both plan-making and decision-taking.

4.3 Paragraph 14 of the Framework states;

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen at the golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plan should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless;
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole; or]
- specific policies in this Framework indicate development should be restricted."

4.4 The Core Strategy's identification of a growth site at Whitchurch is entirely consistent with the NPPF's requirement for local authorities to plan positively to meet the needs of the area. Notwithstanding the above, regard must be had to the Framework's policy in respect of Green Belt in accordance with footnote 9 of paragraph 14. This matter is addressed further below.

4.5 Paragraph 17 sets out the Core Planning Principles of the Framework including;

"actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable"

4.6 The proposed allocation policy RA5 provides a logical and sustainable growth pattern at Whitchurch. As highlighted in section 3 above, the site benefits from ease of access to local amenities via sustainable modes and the also benefits from a regular bus service to the surrounding area including abundant employment opportunities in the wider Bristol urban area. In respect of the local bus service immediately available to the proposed allocation site at Whitchurch, it is prudent to note paragraph 35 of the Framework;

"Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of people. Therefore, developments should be located and designed where practical to:

- Accommodate the efficient delivery of goods and supplies;
- Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
- Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
- Incorporating facilities for charging plug-in and other ultra-low emission vehicles; and
- Consider the needs of people with disabilities by all modes of transport"

4.7 The proposed allocation at Whitchurch can satisfy the requirements of the paragraph 35 above. The site benefits from

its close proximity to Whitchurch and the wider Bristol urban area via sustainable modes.

4.8 The proposed allocation is a deliverable development site and is therefore consistent with paragraph 47 of the Framework which seeks to boost significantly the supply of housing.

4.9 In relation to the Green Belt, paragraph 79 of the Framework highlights that the fundamental aim of the Green Belt is to prevent urban sprawl. In this context, the proposed allocation site RA5 is well contained from the open countryside and view points by virtue neighbouring development, the surrounding road network and well established existing vegetation.

4.10 Paragraph 83 of the Framework requires local planning authorities to demonstrate exceptional circumstances in order to review Green Belt boundaries. In this instance, BANES has demonstrated exceptional circumstances relating to housing need to justify the release of the Horseworld/Gregory/Wilcox land from the Green Belt to enable sustainable residential development. Furthermore, it is considered that the proposed allocation is the most sequentially preferable site for Green Belt release. Specifically, given its self-contained nature, the site's release for development will have the least impact on the strategic openness of the Green Belt compared to other Green Belt sites in this area.

4.11 Paragraphs 150 to 177 of the Framework relates to the preparation of local plans. Paragraph 152 requires local authorities to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development. In this context, a synopsis of the proposed allocation site against the three strands of sustainable development is set out below.

#### Social

4.12 The future residents of the proposed allocation at Whitchurch will help to retain local services and businesses in the immediate local area. Moreover, the development would also deliver a significant number of affordable homes to help meet identified local housing needs. The provision of both market and affordable housing is considered a key contribution towards the social aspect of sustainable development.

#### Economic

4.13 The Framework recognises the contribution of housing in driving economic growth. Housing will create benefits and indirect job creation by being liable for council tax payments and ongoing property management and provision of services and utilities. In addition, future occupiers will spend money in the local area, supporting jobs and businesses as a consequence. The development will therefore provide investment into the local economy and help to retain local businesses and services.

#### Environmental

4.14 In terms of transport, the Framework seeks to achieve a balance of land uses so that people can minimise journey lengths. The proposal will enhance local pedestrian and cycle connectivity and encourage short journeys to local shops and services and the primary school by foot/cycle. The close proximity of the site to local bus stops will also promote the use of public transport, whilst journeys to work are likely to be short given the convenient accessibility to the Bristol urban area.

4.15 The environmental objectives of sustainability can also be addressed with the proper masterplanning and detailed design of the residential development. Furthermore, the site is environmentally sustainable in the context of being the most appropriate site for Green Belt release in the Whitchurch area in order to meet identified housing needs.

4.16 In consideration of the above, the proposed allocation at Whitchurch is considered to address and satisfy all three strands of sustainable development and as such is consistent with the requirements of the Framework to be sustainable development. The presumption in favour of the allocation in the Core Strategy should therefore apply.

#### 5. Conclusions & Recommendations

5.1 The proposed allocation at Whitchurch on the Horseworld/Gregory/Wilcox land is supported.

5.2 The identified site provides the most sustainable location for a Green Belt release in order to help meet the identified additional housing needs in this part of the District. As a result of its well contained nature in landscape and visual terms, and its close proximity to existing settlement, the removal of the site from the Green Belt will not fundamentally undermine the strategic function of the Green Belt in the wider locality.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

5.3 The evidence base for the Core Strategy supports the proposed Whitchurch allocation with regard to landscape, highway and arboricultural assessments.

5.4 The identified site is suitable for residential development. It has no insurmountable constraints that would restrict the residential development of the site.

5.5 The proposed Concept Diagram should be amended to remove the Green Infrastructure Corridor and allow such features to be determined by a comprehensive masterplanning exercise which is informed by the relevant site assessments.

5.6 The proposed strategic allocation at Whitchurch is consistent with the primary objectives of the National Policy Framework in respect of the presumption in favour of sustainable development with regard to plan making and boosting housing land supply.

5.7 The proposed Whitchurch allocation is inherently sustainable given its location and close proximity to existing settlement, shops and services by sustainable modes of travel. The site is suitable, available and deliverable for residential development.

**Change to the policy requested:**

**Respondent Number:** 4669 **Comment Number:** 1 **Respondent Name:** **Respondent Organisation:** Compton Dando Parish Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

We object to the strategic site allocation at Whitchurch, which is close to the borders of the rural parish of Compton Dando, because we believe that the infrastructure is insufficient to support this level of new housing and because we do not believe it meets the sustainable use objectives.

- The site is close to the conservation village of Queen Charlton, which is also close to potential new housing at South West Keynsham, as well as the two K2 developments already approved.

- The amendment proposes residential development only, with the implication that the residents of the 200 new houses (in addition to the 550 already being built on the other side of Charlton Road) will commute to Bristol or Bath, or to new employment sites at Somerdale or Keynsham several miles away.

- Traffic implications for the villages in our Parish are likely to be severe, especially with rat running through the villages to avoid congestion along the main routes, which are already some of the most congested in the country (see A37 and A4 into Bristol and Bath during peak hours), and with no prospect of imminent improvements to public transport or the road network. The junction of Charlton Road with the A37 is particularly bad, especially if turning right.

-The Green Belt between Whitchurch and Keynsham should be preserved, to avoid the two built up areas joining up around Queen Charlton

In our Parish Plan of 2010, the most important priority for our parishioners was to protect the Green Belt and preserve the character of our villages, including Queen Charlton.

**Change to the policy requested:**

We request that this location be removed from the schedule of amendments, or the allocation of housing reduced. We want the Conservation Village of Queen Charlton and its setting protected, and the landscape of the plateau above the Chew Valley kept open and in the Green Belt.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4870 **Comment Number:** 1 **Respondent Name:** Mr T J Hilliar**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA45 Land adjoining Whitchurch**Location:****Comment made on the Proposed Change:**Support: 

The addition of the proposed homes, together with those nearby, already under construction, and other possible proposed developments in this area, will only add to the seriously overloaded A37 arterial route, and also possibly add to the volume of traffic through the Stockwood community.

The current traffic loading on the A37 often causes chaos as far back as the West Town Lane junction in the Bristol direction & Pensford to the south.

Adding to this often slow moving, and sometimes stationary traffic, can only increase the amount of air pollution currently created.

If this development is to be adopted serious consideration should be given to any proposed junction with Staunton Lane as this spot is hazardous enough as it stands.

**Change to the policy requested:****Respondent Number:** 4910 **Comment Number:** 1 **Respondent Name:** Frank Tichborne**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA45 Land adjoining Whitchurch**Location:****Comment made on the Proposed Change:**Support: 

Since the temporary closure of sleep lane to build the houses there, traffic builds up every morning, sometimes backed up all the way to Pensford. Clearly the road will not accommodate extra traffic for another 200 houses. This scheme should not go ahead until the infrastructure is adequate. When the ring road is complete and the link from Stockwood to the Whitchurch viaduct is complete (currently the new proposed housing will cover that route) then traffic in S. Bristol will continue to snarl up. Note the queues are not just at rush hour – any time of day they are backing up to Norton Lane.

Sleep lane has been narrowed to one lane to accommodate a 3 metre long cycle track at probably huge expense to the ratepayers. Quite often the cycle track part is unusable because of overhanging vegetation. Hence when it reopens it is still inadequate to take the Stockwood traffic which tries to avoid the Black Lion traffic light junction. This junction only has room for one right turning car (northbound) which is why they use the sleep lane.

In conclusion the infrastructure is inadequate for the current traffic load. Adding another 200 cars per day with the new housing will be suicidal!

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 4924 **Comment** 1 **Respondent** Alistair Williams**Number:****Number:****Name:****Respondent****Organisation:****Agent ID:****Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA45 Land adjoining Whitchurch**Location:****Comment made on the Proposed Change:**Support: 

Point (1) Transport requirements enhancements will not facilitate the flow of traffic on Sleep Lane / Staunton Lane which will involve Stockwood Lane and the traffic lights at Whitchurch onto the Wells Road.

Point (2) Local amenities will not support the influx of an increase of dwellings

Point (3) Flooding of the natural plain from Whitchurch through Stockwood Vale to Keynsham.

**Change to the policy requested:**

Point (1) All traffic from any proposed development must be directed to Queen Charlton Lane and Whitchurch via Sleep Lane, to access fully onto the Wells Road. No further traffic should be diverted or absorbed onto an already over-subscribed "rat run" of Stockwood.

Point (2) Schools, medical centre and local facilities will be overstretched as part of this urban sprawl.

Point (3) The topography add height above sea level is approx. 84 m with rainfall and flood plain flowing down to Stockwood Vale which is approx. 13m above sea level. The football and rugby ground flood annually. Hard standing which is involved in proposed change to Green Belt would greatly increase flooding in Keynsham.

**Respondent** 4926 **Comment** 5 **Respondent** Cllr Peter Edwards**Number:****Number:****Name:****Respondent****Organisation:****Agent ID:****Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA45 Land adjoining Whitchurch**Location:****Comment made on the Proposed Change:**Support: 

Whitchurch Parish Council does not agree that Whitchurch Village should be a Policy RA5 village with development of up to 200 dwellings.

Whitchurch Village should be a RA1 village with up to 50 dwellings in line with other villages in the area and in accordance with the original status afforded to the village. Whitchurch Parish Council and the residents of Whitchurch Village were never consulted on this change and feel as though they are being discriminated against.

No benefit will be gained by B&NES Council by building 200 dwellings in this area as most people will work, shop etc in Bristol.

B&NES have confirmed that there is no policy/logic in proposing this number of dwellings for Whitchurch Village, it was the residual number of houses to be placed somewhere.

Do not agree that land should be removed from the Green Belt for this purpose when the whole purpose of Green Belt is prevent urban sprawl and retain the identify of the village.

From a questionnaire delivered to each of the 490 homes in the village the overwhelming majority of our village support

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these views and DO NOT want this proposed development.

The Government state that their policy is one of localism and it would be entirely wrong if it does not listen to the views of local people.

Change to the policy requested:

Respondent Number: 4927 Comment Number: 1 Respondent Name: Keith Stuart

Respondent Organisation:

Agent ID: Agent Name:

Further Information available in the original comment?  Attachments sent with the comment?

Change Reference: CSA45 Land adjoining Whitchurch

Location:

Comment made on the Proposed Change:

Support:

I have completely changed my mind reference building Premises in Whitchurch. Who am I (WE) to object when we in Whitchurch all live in houses which are built on ex green field sites. Houses are defenately needed by young people . There is a shortage of houses why should'nt some be built in Whitchurch.

Change to the policy requested:

Respondent Number: 4952 Comment Number: 1 Respondent Name: L Wills

Respondent Organisation:

Agent ID: Agent Name:

Further Information available in the original comment?  Attachments sent with the comment?

Change Reference: CSA45 Land adjoining Whitchurch

Location:

Comment made on the Proposed Change:

Support:

1.I am against anything that takes Green Belt land and WH1 and WH2 is a large amount of Green Belt land.

2.We need to look at houses that are no longer ins use, boarded up or derelict.

Please keep our Green Belt in England.

Change to the policy requested:

Respondent Number: 4995 Comment Number: 1 Respondent Name: Neal Mathias

Respondent Organisation:

Agent ID: Agent Name:

Further Information available in the original comment?  Attachments sent with the comment?

Change Reference: CSA45 Land adjoining Whitchurch

Location:

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In addition to the attached letter I would like to object to the planned houses in Whitchurch Village by adding the following points :-

1.Plans to build a further 200 houses in the designated areas CSA46/CSA47 and WH1/WH2 would completely ruin the village. WH1 would effectively join Whitchurch village up with Stockwood causing a loss of identity as the village would get swallowed up. I feel the sheer volume of houses proposed for the area would remove the village feel and turn the area into a housing estate.

2.Whitchurch village already has 47 houses being built on Sleep Lane. This is more than enough for the size of the village. Other surrounding villages should take their share.

3.Keynsham has somewhere in the region of 2150 houses planned. Whilst this is a large number, I don't see why increasing that by a 100 or so could not be accommodated there rather than ruining our village.

4.There is insufficient infrastructure to cope with a further 200 houses in the village, on top of the 47 being built now. Roads are badly congested currently as queues develop down to the traffic lights on the A37, there is poor bus service from the village and none to Keynsham. Primary Schools are full (30 to a class), The Doctor's surgery in Stockwood is full, as appointment waiting times testify. Adding an additional 200 houses to this will have a hugely detrimental effect on the people who live in the village currently.

**Change to the policy requested:**

**Respondent Number:** 5071 **Comment Number:** 1 **Respondent Name:** Rachel and Robert Holley

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:**

**Comment made on the Proposed Change:**Support: 

Please find attached our objection to building on the greenbelt land surrounding Whitchurch villiage.

The traffic is already unbearable and more households would just increase this problem. It may help housing numbers but it will just create other problems and bad stats for the council in the long run. Please don't ruin our unique neighbourhood, I have only recently moved here to raise a family and it will all have be en pointless should the village be ruined.

**Change to the policy requested:**

**Respondent Number:** 5074 **Comment Number:** 1 **Respondent Name:** Mr Peter Gardiner

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

have read and fully support the comments made by Whitchurch Parish Council who strongly oppose the suggested to the core strategy as they relate to Whitchuch.

I feel it is vital that the principle that the boundaries of the Green Belt should be regarded as immoveable should be respected.. Once building is allowed in one area more is sure to follow. - an argument to my personal knowledge used by planning authorities to oppose green belt applications. In this case the extent of the proposed area would totally change the character of the village. I find it amazing that the size of the area proposed pays no regard to the fact that only proposed vehicle access is unto a single track road which forms part of the National Cycle network. The road is not susceptible to widening to accommodate the vast amount of traffic which would be generated. It is noted that the proposed additional housing in Whitchurch is the only such amendment in BANES not linked to the creation of employment opportunities locally so that travel into Bristol or elsewhere for work is inevitable. Forty seven houses are already been built on the west side of Sleep Lane – the junctions at both ends of this lane are extremely difficult. It is to be hoped that the Inspector who considers this matter will have full opportunity to fully observe the volume of traffic passing along the A37 road and up and down Staunton Lane at various times of the day. He or she will also note that the nearest shops (apart from one small village store) and the village school are barely in walking distance – especially in bad weather or if the carrying of shopping or if young children are involved. The facilities and infrastructure available to support the development are clearly at present inadequate and the strategy does not from the details supplied to visitors to the s show no indication of any intention to improve the roads or any other infrastructure. To my knowledge no roads serving or in the immediate vicinity have been improved or constructed in at least the last 80 years and almost all the local shops have closed, the buildings have been converted to other uses – largely estate agencies.

The above comments apply with equal force to the possible alternatives mention in WH1 and WH2 in the Core Strategy

**Change to the policy requested:**


<b>Respondent Number:</b> 5111	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Joanne Monelle	<b>Respondent Organisation:</b>
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**Agent ID:**      **Agent Name:****Further Information available in the original comment?**       **Attachments sent with the comment?** **Change Reference:** CSA45 Land adjoining Whitchurch**Location:**

**Comment made on the Proposed Change:**Support: 

Please listen to the voices of the villagers who have for a long time have voiced concern over development of this area. The green belt should not be removed. I understand that previous decisions by councils/government were the brownfield sites should be developed not greenbelt ( greenbelt land is more desirable so is it greed that is prompting this decision rather than need?). If more housing is allowed in Whitchurch Village, we will be swallowed up into a urban concrete jungle. At present the schools are full, The main A37 is congested at the best of times it will be absolutely gridlocked should houses be built, as will all the side roads as people try to use them as rat runs to reach town ,where the majority of jobs are. The roads have experienced flooding recently and surely, with more concrete covering the land, this problem will increase. There is a plan to build 700 houses at Keynsham surely this number is enough for Banes to develop in the immediate area, although if this goes ahead traffic again will be horrendous as Whitchurch and Stockwood will be used as a cut through to the main road. We border Bristol who do not want further development, if these houses go ahead where will the boundary lie, will we be merged in ?

One of the areas earmarked is the field used for the annual Village fete, one of the largest locally, how preposterous is the decision to remove its greenbelt status.

I along with the majority of residents in the village have summited comments about proposed developments several times previously and my opinions will not change. We do not want or need this development. look for more suitable areas, don't just think you need 200 houses so just stick them at Whitchurch Village, its a very short-sighted decision. Look

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at the long term problems that will arise, traffic congestion, no schools, little employment, flooding as well as destroying natural habitat for animals and green land.

If house are genuinely needed, review the figure, keep us in line with other villages that are having small developments.

Just wanted to say that I thought England was supposed to be a green and pleasant land not a sprawling concrete jungle. The Government say that their policy is one of localism and it would be entirely wrong if it does not listen to the views of local people.

**Change to the policy requested:**

**Respondent Number:** 5152 **Comment Number:** 1 **Respondent Name:** Mr& Mrs R J Whitchurch **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA45 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

Support:

We strongly object to the proposed changes of above.

Having lived in Whitchurch village for a large number of years, off of Staunton lane into Staunton fields, the quality of life has greatly been reduced . This it appears the council rarely take into account?

Since we have lived here, we have seen,

- (1) Our school year after year over full(Whitchurch Primary)
- (2) The closure of Stockwood Green Primary School
- (3) The loss of our post office and store.
- (4) The loss of a valued bus service
- (5) A huge increase in traffic in and around the area.
- (6) The local health centre is full(Stockwood)
- (7) The proposed loss of the only play area we have.
- (8) It can be very stressful some mornings and evenings, we cannot get in or out of Staunton fields because the traffic is queued from the traffic lights in the village back to horse world .

So ifwith the councils proposed changes, you also provide, a post office, bus service, new roads and systems, additional health services, new play area, new schools, plus all the valid reasons for not progressing the Horse World proposal, the council's proposal for changes in core strategy cannot proceed .

**Change to the policy requested:**

**Change Reference:** CSA46 Land adjoining Whitchurch

**Respondent Number:** 0 **Comment Number:** 10 **Respondent Name:** Multiple **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

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**Change Reference:** CSA46 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

Support:

CSA 46 Should remain

**Change to the policy requested:**

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 4 to this schedule.]

**Respondent Number:** 0 **Comment Number:** 4 **Respondent Name:** Multiple

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA46 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

Support:

CSA 46 Should remain

**Change to the policy requested:**

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 3 to this schedule.]

**Respondent Number:** 0 **Comment Number:** 16 **Respondent Name:** Multiple

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA46 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

Support:

CSA 46 Should remain as Green Belt.

**Change to the policy requested:**

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 5 to this schedule.]

**Respondent Number:** 86 **Comment Number:** 5 **Respondent Name:**

**Respondent Organisation:** Whitchurch Parish Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA46 Land adjoining Whitchurch

**Location:**

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Do not agree with the new concept diagram.

**Change to the policy requested:****Respondent Number:** 170 **Comment Number:** 9 **Respondent Name:** Robert Hitchins Ltd**Respondent Organisation:****Agent ID:** 19 **Agent Name:** Pegasus Planning Group**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA46 Land adjoining Whitchurch**Location:****Comment made on the Proposed Change:**Support: 

Objection is made to the allocated site. – see representations on CSA 44 and CSA 45

**Change to the policy requested:**

WH1 should be allocated instead of the proposed site included on the Concept Diagram on page 63 of the Schedule of Amendments to the Core Strategy.

See representations in respect of CSA 44 and 45

**Respondent Number:** 428 **Comment Number:** 5 **Respondent Name:** Susan Wilkes**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA46 Land adjoining Whitchurch**Location:****Comment made on the Proposed Change:**Support: 

CSA 46 should remain.

**Change to the policy requested:****Respondent Number:** 4926 **Comment Number:** 4 **Respondent Name:** Cllr Peter Edwards**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA46 Land adjoining Whitchurch**Location:****Comment made on the Proposed Change:**Support: 

Ref CSA46

Do not agree with the new concept diagram .

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Change to the policy requested:

**Change Reference: CSA47 Land adjoining Whitchurch**Respondent 0  
Number:Comment 17  
Number:Respondent Multiple  
Name:Respondent  
Organisation:

Agent ID: Agent Name:

Further Information available in the original comment?  Attachments sent with the comment? 

Change Reference: CSA47 Land adjoining Whitchurch

Location: Land adjoining Whitchurch

Comment made on the Proposed Change:

Support: 

CSA 47 This land should not be removed from the Green Belt. Removing it from GB is presumably to make way for housing development which is inappropriate here. The Infrastructure cannot cope. A37 is already congested, primary school oversubscribed, no NHS Dentist or Post Office, very limited local employment all of which render any such development as unsustainable particularly with reference to the first paragraph of this letter. In fact B&NES Planning Committee have recently refused a planning application for 125 houses at this site for the above reasons so it seems illogical therefore that B&NES should seek to remove this land from GB.

Change to the policy requested:

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 5 to this schedule.]

Respondent 0  
Number:Comment 11  
Number:Respondent Multiple  
Name:Respondent  
Organisation:

Agent ID: Agent Name:

Further Information available in the original comment?  Attachments sent with the comment? 

Change Reference: CSA47 Land adjoining Whitchurch

Location: Land adjoining Whitchurch

Comment made on the Proposed Change:

Support: 

CSA 47 Should not have Green Belt status removed.

Change to the policy requested:

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 4 to this schedule.]

Respondent 86  
Number:Comment 6  
Number:Respondent  
Name:Respondent Whitchurch Parish  
Organisation: Council

Agent ID: Agent Name:

Further Information available in the original comment?  Attachments sent with the comment? 

Change Reference: CSA47 Land adjoining Whitchurch

Location:

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

Whitchurch Parish Council does not agree that the policies map should be changed to show the boundary of the site allocation for land at Whitchurch and the revised Green Belt boundary.

**Change to the policy requested:****Respondent Number:** 170 **Comment Number:** 10 **Respondent Name:** Robert Hitchins Ltd**Respondent Organisation:****Agent ID:** 19 **Agent Name:** Pegasus Planning Group**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA47 Land adjoining Whitchurch**Location:****Comment made on the Proposed Change:**Support: 

Objection is made to the allocated site – see representations on CSA 44 and CSA 45

**Change to the policy requested:**

WH1 should be allocated instead of the proposed site included on the Concept Diagram on page 63 of the Schedule of Amendments to the Core Strategy.

See representations in respect of CSA 44 and 45

**Respondent Number:** 428 **Comment Number:** 4 **Respondent Name:** Susan Wilkes**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA47 Land adjoining Whitchurch**Location:****Comment made on the Proposed Change:**Support: 

CSA47 Should not have Green Belt status removed. Infrastructure cannot cope. Schools full, no employment, no Post Office, no NHS dentist, A37 congested. Development here would be unsustainable and unwanted by Bristol City Council.

**Change to the policy requested:****Respondent Number:** 1024 **Comment Number:** 1 **Respondent Name:****Respondent Organisation:** Bristol City Council**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA47 Land adjoining Whitchurch**Location:** Comment on multiple Strategic Sites**Comment made on the Proposed Change:**Support: 

Bristol City Council has previously made representations on the Schedule of Proposed Changes to the Submitted Core

Strategy, published for consultation in March 2013. The council's comments related to proposals for the release of Green Belt land at Whitchurch for housing development and focused on matters of principle. In particular, concerns were raised over inconsistency with the submitted spatial strategy, loss of Green Belt, impact on south Bristol regeneration, impact on highways and impact on local services, green infrastructure and residential amenity. Bristol City Council understands that the current consultation is confined to the suggested strategic sites and Green Belt boundaries and the Placemaking Principles relating to their development. On this basis Bristol City Council would like to make the following observations:

#### Strategic Allocation - Location

The Green Belt Review Stage 2 Report commissioned by B&NES considers the extent to which specific land cells surrounding Whitchurch Village, labelled A to F, fulfil the five Green Belt purposes identified in the NPPF. Bristol City Council notes that the proposed Strategic Allocation at Whitchurch lies within and to the south of land cell E. The report considers that this area fulfils 2 of the NPPF purposes, namely purpose 3, 'to assist in safeguarding the countryside from encroachment' and purpose 5, 'to assist in urban regeneration...'. Given the land cell's southerly location away from the Bristol urban boundary, purpose 1, 'to check the unrestricted sprawl of large built up areas' and purpose 2, 'to prevent neighbouring towns merging into one another', are considered less relevant. Bristol City Council concurs with the Green Belt Review's assessment of the extent to which land in this location fulfils relevant Green Belt purposes identified in the NPPF.

In respect of the other land cells, the report found that a number of purposes are fulfilled depending on the relationship with the Bristol Urban boundary and/or the topography of the land cell. The most sensitive locations include land contiguous with both the Bristol Urban area and Whitchurch Village. Development in these locations could result in a merging of built-up areas and the loss of identity to Whitchurch Village.

A planning application (ref. 13/02164/OUT) for up to 125 dwellings was recently submitted in respect of land at Horseworld. The application site is within the proposed strategic allocation. It is clear from the committee report that B&NES Council's officers considered that the proposals would constitute inappropriate development in the Green Belt, would encroach into the countryside, would change its character and harm the openness of the Green Belt. B&NES Council's officers also considered that the proposals would harm the amenity value of the adjacent public rights of way network and would give rise to adverse landscape and visual impacts, although it was felt that maturing landscape would lessen this over time. However, it was felt that wider impacts were unlikely to be significant. Although B&NES Council's officers recommended the application for approval, on the basis of 'very special circumstances', the Development Control Committee determined that the application be refused. Bristol City Council understands that the Development Control Committee did not consider that harm to the green Belt was outweighed by any special circumstances. Bristol City Council has previously made representations on the application expressing concerns over inappropriate development within the Green Belt but considered that B&NES' officers were best placed to judge where 'very special circumstances' existed.

The Green Belt Review and the recent decision at Horseworld are important considerations in determining whether sites should be allocated in this area. However, on the basis that a strategic allocation is required at Whitchurch, to address the Inspector's concerns around housing delivery, preference should then be given to the least sensitive Green Belt locations. Having regard to the Green Belt Review, the impacts on Green Belt purposes would be less severe at the location proposed for the site allocation than alternative options considered. In particular, Bristol City Council's core concerns relating to the maintenance of the Green Belt at the edge of the city and the separation of the city from neighbouring settlements are allayed by the choice of location. As the proposed allocation adjoins the existing built-up area of Whitchurch village and placemaking proposals include the retention of existing hedgerows and trees and provision of additional green infrastructure for screening, it is considered that the visual impact of development in this location can also be reduced. Bristol City Council support the rejection of option WH1 as development here would merge South Bristol with Whitchurch Village. The rejection of WH2 is also supported as the site is more open in character and would be likely to have a greater visual impact given its relative detachment from the village.

In this respect Bristol City council would not object to the proposed Strategic Allocation on the basis of its being the least harmful of the options considered for the removal of land from the Green Belt.

#### Strategic Allocation Area

Bristol City Council is concerned that the proposed strategic allocation at Whitchurch should provide for 200 homes only.

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If Green Belt is to be released for development the land take should be the minimum that is necessary to provide for that level of housing. The average density figure provided in the Placemaking Principles should be as high as can be achieved having regard to the local context and character and should not result in any under-development of the site.

The concept map in Annex 2 shows a parcel of land to the east of the Strategic Allocation that is also proposed to be removed from the Green Belt. As the land is not required to provide for the 200 homes identified the area should remain within the existing Green Belt designation. The change to this part of the Green Belt boundary is not supported.

### Change to the policy requested:

CSA46: Amend Concept diagram to show Green Belt boundary aligned with Strategic Site allocation boundary

**Respondent Number:** 1024 **Comment Number:** 2 **Respondent Name:** **Respondent Organisation:** Bristol City Council

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA47 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

### Comment made on the Proposed Change:

**Support:**

Safeguarding of Land

Bristol City Council notes the intention to consider any requirement to safeguard land as part of the Core Strategy review (change ref. CSA44). For the reasons set out in the council's previous representation (on the Schedule of Proposed Changes to the Submitted Core Strategy - March 2013), summarised above, it is considered that there is little or no scope to identify safeguarded land in this area for the longer term. Further Green Belt releases for housing would increase the likelihood of more sensitive locations coming forward and could result in a scale of future development disproportionate to the size of the settlement. Such an approach would be contrary to the original strategy proposed for Whitchurch, namely, small-scale development with community support. This change is not supported.

### Change to the policy requested:

CSA44: Delete following sentence - "Given the close relationship of the village with Bristol the need for and scope to identify safeguarded land will be considered as part of the Core strategy review."

**Respondent Number:** 4522 **Comment Number:** 1 **Respondent Name:** Barbara Fiedor **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA47 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

### Comment made on the Proposed Change:

**Support:**

CSA 45 (Whitchurch) has issues that could see delays and difficulties in delivering some or all of the planned 200 dwelling that are needed at this Strategic location. These dwellings are needed to contribute to the extra housing required by the region during the Core Strategy Plan period.

A Planning Application (13/021640/OUT) for 125 dwellings was refused by Bath and North East Somerset Council on 12/12/13. This site (Horse World) is included in the area covered by the Strategic Site Allocation Land at Whitchurch.

The planning application saw many objections including that from Bristol City Council who raised objections about the potential problems including the additional traffic and the pressures on local services that development at this location

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would cause.

We feel that smaller non Strategic Sites can make a valuable contribution to the revised number of dwellings that are required to make the Core Strategy sound. If smaller sites were to be identified as locations suitable for development they could contribute to the number of houses that are required by the plan.

A site identified as K14 has been promoted as a potential development site in the BANES Strategic Housing Land Availability Assessment. This land at St Francis Road in Keynsham at present consists of a number of large gardens that are mostly in the Green Belt but could be utilised to provide housing should the Green Belt at this location be reviewed and changed.

An anomaly exists that sees the Green Belt Boundary cross these gardens leaving one third of each garden not in the Green Belt and two thirds of each garden included in the Green Belt.

This anomaly, if addressed would require a minor adjustment to the Green Belt with a new Green Belt Boundary redrawn to follow a strongly defined tree line that already exists at the northern perimeter of the site. A revised Green Belt Boundary here would follow the field boundary that existed when the Green Belt was established and now would seem to form a far more logical boundary than the one that exists today.

This field boundary sees the land fall away steeply forming a natural boundary that will more adequately define the Green Belt at this point. This could facilitate a modest development that we feel would not in any way contribute to any urban sprawl but would be a natural rounding off of the existing urban landscape.

A development here would make more efficient use of land that is at present underutilised.

The site has been assessed by BANES in its SHLAA as being 'within walking distance of Keynsham Town Centre and as having public transport links. The carriageway and footpath provision is also adequate'.

NPPF paragraph 14 states 'at the heart of the NPPF is a presumption in favour of sustainable development'. We believe the location of K14 makes it a very sustainable site. The site borders Broadlands Academy, is well above the flood plain and also has the advantage of having an existing storm water drain crossing the lower slopes of the site.

With the increasingly important issue of climate change and the need for carbon emission reduction we feel that this modest site is extremely well placed to deliver sustainable development. We anticipate that new dwellings here will be highly insulated, have solar pv panels, solar thermal panels and water saving/recycling facilities.

This site is also included in the BANES SHLAA November 2013 Housing Trajectory (2011-2029) under the heading of 'Suitable and Available Land' and is described as land at St Francis Road.

Thank you.

**Change to the policy requested:**

<b>Respondent Number:</b> 4604	<b>Comment Number:</b> 3	<b>Respondent Name:</b>	<b>Respondent Organisation:</b> Barratt Homes Bristol
<b>Agent ID:</b> 176		<b>Agent Name:</b> Nathaniel Lichfield & Partners	
<b>Further Information available in the original comment?</b> <input type="checkbox"/>		<b>Attachments sent with the comment?</b> <input type="checkbox"/>	

**Change Reference:** CSA47 Land adjoining Whitchurch

**Location:** Land adjoining Whitchurch

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Barratt Homes objects to the precise boundary definition along Queen Charlton Lane.

The proposed boundary should be amended at the south west of the strategic allocation. This will facilitate the delivery of the strategic allocation. The proposed boundary amendment is shown on the attached plan Drawing No IL31089\_01-001

Barratt Homes has an interest in the areas marked orange. This area is included within the strategic allocation. Barratt Homes also has an interest in adjacent land; this is marked on the plan in purple. The additional land poses a logical inclusion to the greenbelt release but does not adversely impact upon any of the Purposes of the greenbelt as defined by the NPPF or those identified in the Arup Study (September 2013). The boundary shown in the context map (Annex 2 to the Amendment document) appears to have been drawn to reflect apparent garden boundaries rather than reflecting optimum areas for delivery.

Now that we can confirm that Barratt Homes has an interest in this additional parcel of land, it appears to be sensible to marginally increase the greenbelt area to be released to include this small parcel.

**Change to the policy requested:**

Boundary Amendment

The Residential led development Proposals Map should be amended so that the greenbelt release includes a parcel of land to the south east of the allocation as proposed on the enclosed drawing No. IL31089\_01-001

**Respondent Number:** 4926 **Comment Number:** 3 **Respondent Name:** Cllr Peter Edwards

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA47 Land adjoining Whitchurch

**Location:**

**Comment made on the Proposed Change:**Support: 

Ref CSA 47

Whitchurch Parish Council does not agree that the policies map should be changed to show the boundary of the site allocation for land at Whitchurch and the revised Green Belt boundary .

**Change to the policy requested:****Change Reference: CSA49**

**Respondent Number:** 180 **Comment Number:** 12 **Respondent Name:**

**Respondent Organisation:** J S Bloor Ltd

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA49

**Location:**

**Comment made on the Proposed Change:**Support: 

The Proposed Amendment to remove land from the Green Belt at South West Keynsham is supported and is consistent with the NPPF. However, where it fails to be consistent with the NPPF is in relation to the second part of para 83 ie "Once established Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended

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permanence in the long term, so that they should be capable of enduring beyond the plan period.”

The Proposed Amendment fails to address the longer term issues as the alteration of the Green Belt is limited to accommodate 200 dwellings on the site.

**Change to the policy requested:**

Paragraph 6.63 should redrafted so that the changes to the Green Belt recognise the long term issues in terms of safeguarding opportunities. Changes to para 6.63 will have consequences for Policy KE4 and associated text in order for the plan to be sound and consistent with national policy para 85 of the NPPF.

**Respondent Number:** 2564 **Comment Number:** 19 **Respondent Name:**

**Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA49

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**

**Support:**

19. The amendment here clarifies and expands upon what has been discussed above. It deletes the sentence that ‘revised boundaries in these locations will be established through the Placemaking Plan’. It is now the intention and effect of the amendment that the Placemaking Plan provides the opportunity for a review of the inner detailed boundary, such as to address anomalies. However, this fails to address the key issue highlighted in relation to non strategic green belt sites which is that there is no mechanism for medium sized sites to come forward within the green belt on the edge of Bath. This needs to be rectified and reference included in these amendments to a specific mechanism which would properly seek to identify and assess suitable green belt sites for development. So far the plan has entirely failed to consider these types of sites and as such is seriously flawed which threatens the soundness of the plan.

**Change to the policy requested:**

**Respondent Number:** 4803 **Comment Number:** 9 **Respondent Name:** Simon Steel-Perkins

**Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA49

**Location:**

**Comment made on the Proposed Change:**

**Support:**

19. The amendment here clarifies and expands upon what has been discussed above. It deletes the sentence that ‘revised boundaries in these locations will be established through the Placemaking Plan’. It is now the intention and effect of the amendment that the Placemaking Plan provides the opportunity for a review of the inner detailed boundary, such as to address anomalies. However, this fails to address the key issue highlighted in relation to non strategic green belt sites which is that there is no mechanism for medium sized sites to come forward within the green belt on the edge of Bath. This needs to be rectified and reference included in these amendments to a specific mechanism which would properly seek to identify and assess suitable green belt sites for development. So far the plan has entirely failed to consider these types of sites and as such is seriously flawed which threatens the soundness of the plan.

**Change to the policy requested:**

## Change Reference: CSA50

**Respondent Number:** 114 **Comment Number:** 1 **Respondent Name:**

**Respondent Organisation:** Society of Merchant Venturers

**Agent ID:** 150 **Agent Name:** SmithsGore

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA50

**Location:** Land adjoining East Keynsham

**Comment made on the Proposed Change:**Support: 

1. On behalf of the Society of Merchant Venturers, Smiths Gore Planning objects to proposed change CSA50.

2. We object to the proposed amendment to paragraph 6.63A of the Core Strategy in respect of safeguarded land. The Council suggest in the amended paragraph that it has considered the need for safeguarded land to meet longer term development needs. The Inspector in his note ID/40 (September 2013) advises that, "If the Council is considering delaying the hearings to put forward allocations, the Council must give itself time to do this thoroughly and with careful explanation of the reasons for its choice of boundaries and policy requirements." The Inspector further recommends that, "clear, justified site boundaries for the allocation, as well as consequential changes such as the Green Belt boundary; there would need to be proper consideration of the scope for any safeguarded land when changing the boundary." We would contend that the Council has not thoroughly considered these issues. At our response to change reference CSA8 we set out where we consider there are clear anomalies in the Council's consideration of land to be removed from the Green Belt to the east of Keynsham and what appears to be unintended consequent release of land from the Green Belt for development at south west Keynsham which could provide 100+ dwellings. There may be other examples, however our investigation has been restricted to Keynsham where our client interests lie.

3. There has been a plethora of documentation produced at stages during the course of the examination to the extent that the plan appears to be evidence justified rather than evidence based. Whilst yet further documentation to justify the plan approach is not desirable a key piece of evidence/justification is missing as regards the assessment of the potential for identification for safeguarded land. It appears that the Council have opted for a 'knee jerk reaction' to the identification of such land in response to the NPPF and the Inspector's questions. In their response to the Inspector's questions in BNES/47 dated 13 September the Council contend that, "One option could be that the Core Strategy could be amended to provide the strategic decision on the location of SGL. Based on the above analysis, the Core Strategy would require land to be safeguarded at south west Keynsham and at Whitchurch to meet development needs post 2029. However, this approach would not have the benefit of being informed by the further work being undertaken as part of the Placemaking Plan and so there is insufficient evidence to make this strategic decision at this stage. There is no assessment, for example, of the Green Belt boundary around Keynsham and where land may not be required to be retained within the Green Belt."

4. The most recent document published in relation to Green Belt Boundary Review is the Council's Green Belt Report Stage II published in September and which is confined in its assessment to the proposed allocated sites. This document specifically states it does not make any assessment of safeguarded land (page 2 of that report refers).

5. The Land at Uplands Farm, Keynsham has been assessed by the Council at various stages as potential for supporting the housing land supply at Keynsham. The land in this location was assessed via a Development Concept Options Report dated March 2013. Similar reports were considered for land at south Keynsham, now a proposed allocation, East Keynsham, now a proposed allocation and west Keynsham which has a significant Green Belt purpose in maintaining the gap between Keynsham and Bristol. In the Development Concept Options Report for south east Keynsham at page 14 under the heading 'The Need to Maintain the Keynsham-Saltford 'Gap' it is commented "it is necessary to leave a significant green corridor and avoid extending the development too far to the east". This statement clearly indicates the land to the west does not have a detrimental impact on the Keynsham-Saltford gap. Indeed the concept plan we have provided as attached to our earlier representation would still maintain a significant gap between the outer built edge of Keynsham and the built edge of Saltford at about 900m. The gap between the two settlements would not actually be reduced by the proposed

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development of the land indicated and the Keynsham-Saltford gap would therefore be preserved. This is in contrast East Keynsham where the gap between Keynsham and Saltford would be significantly reduced with incursion well within the Keynsham-Saltford gap. (Our statement in response to CSA38 refers). As regards the second purpose of Green Belts to prevent neighbouring towns merging together the development of land to the east at Uplands Farm as shown on our concept plan diagram would not impact negatively on the purpose of ensuring the separation of settlements.

6. As regards landscape impact and therefore the effect of development on the third purpose of Green Belts, to safeguard the countryside from encroachment, the Development Concept Options Report for land at Upland Farm advises that, "The study area sits below the ridgeline and could be designed to have only limited impact on wide views to the south. Additionally, the land form itself restricts views from the south (hill top) meaning the area is largely hidden from the nearby industrial estate and roads". As regards the third purpose of Green Belts to safeguard the countryside from encroachment the development of land at Uplands Farm as shown on our concept plan diagram would not impact negatively on this purpose.

7. The Bath and North East Somerset IDP update issued May 2013 at Appendix G identifies at G1.5 that the overall highways impact of a development in the location of Uplands Farm is likely to be manageable. Development in this location could promote better bus provision to the wider south east area through increased opportunity for bus patronage. By contrast the east of Keynsham proposed safeguarded land cannot be brought forward until the necessary transport infrastructure improvements in the A4 corridor have been secured.

8. The Development Concept Options Report for Uplands Farm identifies the synergy of a development here with development at land proposed to be allocated at East Keynsham and access to services and facilities. It should also be noted that both the land proposed for allocation at south west Keynsham and land at Uplands Farm are similarly classified within the SHLAA Report of Findings at Appendix 1c(ii) as being of low suitability/credentials. Whilst south west Keynsham forms a development allocation land at Uplands Farm has been overlooked.

9. There is clearly land at Uplands Farm between the southern urban edge of Keynsham and the Uplands Farm buildings complex (a residential conversion) that is not required to be retained within the Green Belt and which we would contend would have far less impact on the Green Belt than release of land at East Keynsham. Whilst we consider the land should form an allocation as set out in our previous representations if this is not accepted by the Inspector then the site should clearly be safeguarded land.

10. The Council's approach to safeguarded land is unsound. It has assessed parts of the inner Green Belt around settlements in detail (where these coincide with its preferred allocations) but has used a wide generic approach in other instances and even so where their own evidence has suggested a closer look is warranted, such as at Uplands Farm.

11. We would suggest that the Council take the approach they advised was appropriate in their responses to the Inspector's questions at BNES/47 and make a detailed assessment around Keynsham. This is the only way that the consideration of safeguarded land can be taken forward effectively and to ensure a requirement of the NPPF is not overlooked. At present the evidence base to support the identification of safeguarded land is absent. In short the identification of land to the east of Keynsham as safeguarded land is the wrong choice as it serves the important purpose of preventing the merging of towns.

12. Whilst we consider the land at Uplands Farm should be allocated for development for reasons set out in our earlier representations if the Council is seeking to identify safeguarded land then their own evidence base draws the conclusion that land at Uplands Farm would be preferable to land at East Keynsham, as set out in the attached plan shown as Appendix 1.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 170 **Comment Number:** 12 **Respondent Name:** Robert Hitchins Ltd**Respondent Organisation:****Agent ID:** 19 **Agent Name:** Pegasus Planning Group**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA50**Location:****Comment made on the Proposed Change:**Support: 

The changes to para 6.63A are not justified or sound when assessed against the NPPF in particular para 85.

The Sustainability Appraisal Addendum Report CD10/A1/1 does not provide any analysis of safeguarding land in any location. It does however, acknowledge in paragraph 4.2 in the context of Policy DW1 that: "Safeguarded land for future development would have major positive effects on meeting social and economic objectives in that it gives a degree of certainty about continuity of housing provision."

It is noted that the Site Appraisals, (Annex O) have helped to identify more specifically the areas with good potential to link to existing communities to promote vibrant and cohesive communities. They also help to avoid the areas without physical links or good potential to be linked by public transport or areas with disproportionality high infrastructure costs. However, this has not translated into any land being safeguarded apart from at East Keynsham and even this area the justification appears to be weak as it is reliant on necessary transport improvements in the A4 corridor - only when these have been secured will development be permitted.

Annex O the Green Belt Site Allocations Sustainability Appraisal is an addendum to the SA Report Annex L. However, it does not consider the issue of safeguarded land in the Green Belt. Consequently the schedule of amendments fails to address the strategic matter of safeguarded land in a consistent manner; only land to the east of Keynsham is to be safeguarded.

For both Weston and Odd Down, on the edge of Bath the reasons for not safeguarding land is that these areas are environmentally sensitive.

The Council have indicated in some areas that the safeguarding issue will be addressed in a review of the Core Strategy, however there is no certainty over the timing of this review i.e. when it will be undertaken, particularly as the Council indicate that the first review will be timed to enable co-ordination with the review of the core strategies of adjoining authorities in the West of England. Whilst the Duty to Co-operate appears as a standing item on the West of England Planning Housing and Communities Board agenda, there is no commitment to any timetable for the review of Core Strategies and much will depend on the outcomes of the Joint SHMA which has been commissioned, but it is not expected to report until autumn 2014, and even then these will only be draft findings.

The justification for safeguarded land at east Keynsham cannot be supported in what is acknowledged to be a highly sensitive part of the Bristol Bath Green Belt i.e. the Keynsham –Saltford gap. Transport capacity limits the acceptable amount of development and there is no overriding evidence that these constraints can be overcome during the plan period. (BNES 51 para 3.46 and BNES 47 para 5.19.)

It is noted that the Site Appraisals, (Annex O) have helped to identify more specifically the areas with good potential to link to existing communities to promote vibrant and cohesive communities. They also help to avoid the areas without physical links or good potential to be linked by public transport or areas with disproportionality high infrastructure costs. However, this has not translated into any land being safeguarded apart from at East Keynsham and even this area the justification appears to be weak as it is reliant on necessary transport improvements in the A4 corridor - only when these have been secured will development be permitted.

Annex O the Green Belt Site Allocations Sustainability Appraisal is an addendum to the SA Report Annex L. However, it does not consider the issue of safeguarded land in the Green Belt. Consequently the schedule of amendments fails to address the strategic matter of safeguarded land.

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Both in ID 36 and ID 40 the Inspector has commented on the failure of the plan to address the issue of safeguarded land. In para 16 of ID 36 the Inspector has commented that the plan needs to provide a strategic steer and that the issue of safeguarded land is a strategic matter which the Core Strategy should be addressing so that the Place-making Plan has a clear outcome to delivery.

### Change to the policy requested:

A comprehensive review of safeguarding land should be undertaken in accordance with the NPPF para 85, it is not sound to delay this issue until the review. The approach to safeguarding land should meet longer term development needs stretching beyond the plan period. Safeguarded land can only be granted following a review of the Local Plan

**Respondent Number:** 180

**Comment Number:** 13

**Respondent Name:**

**Respondent Organisation:** J S Bloor Ltd

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA50

**Location:**

### Comment made on the Proposed Change:

Support:

The changes to para 6.63A are not justified or sound when assessed against the NPPF in particular para 85.

The Sustainability Appraisal Addendum Report CD10/A1/1 does not provide any analysis of safeguarding land in any location. It does however, acknowledge in paragraph 4.2 in the context of Policy DW1 that: "Safeguarded land for future development would have major positive effects on meeting social and economic objectives in that it gives a degree of certainty about continuity of housing provision."

It is noted that the Site Appraisals, (Annex O) have helped to identify more specifically the areas with good potential to link to existing communities to promote vibrant and cohesive communities. They also help to avoid the areas without physical links or good potential to be linked by public transport or areas with disproportionality high infrastructure costs. However, this has not translated into any land being safeguarded apart from at East Keynsham and even this area the justification appears to be weak as it is reliant on necessary transport improvements in the A4 corridor - only when these have been secured will development be permitted.

Annex O the Green Belt Site Allocations Sustainability Appraisal is an addendum to the SA Report Annex L. However, it does not consider the issue of safeguarded land in the Green Belt. Consequently the schedule of amendments fails to address the strategic matter of safeguarded land in a consistent manner; only land to the east of Keynsham is to be safeguarded.

For both Weston and Odd Down, on the edge of Bath the reasons for not safeguarding land is that these areas are environmentally sensitive.

The Plan also considers that there is no scope for safeguarding land at South West Keynsham, however, the arguments to justify this approach are flawed as the wider area has been considered in the Arup Report and has potential for development and the previous Local Plan Inspector also considered that this direction was the only direction in which Keynsham could accommodate growth.

The Council have indicated in some areas that the safeguarding issue will be addressed in a review of the Core Strategy, however there is no certainty over the timing of this review i.e. when it will be undertaken, particularly as the Council indicate that the first review will be timed to enable co-ordination with the review of the core strategies of adjoining authorities in the West of England. Whilst the Duty to Co-operate appears as a standing item on the West of England Planning Housing and Communities Board agenda, there is no commitment to any timetable for the review of Core Strategies and much will depend on the outcomes of the Joint SHMA which has been commissioned, but it is not expected to report until autumn 2014, and even then these will only be draft findings.

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In respect of East Keynsham which seems to be the only area identified where land can be safeguarded, it is noted in Annex O that Area A is accessible to employment opportunities it is relatively remote from the town centre of Keynsham and to the north of the railway line and also the A4 and therefore without easy access to the existing community facilities and locate services by means of transport other than the private car, and has limited connections to neighbouring residential areas. The appraisal indicates that there are potential benefits of a vehicular linkage between the A4 and A4175 from the north of the railway line and there is potential for longer term transport improvements but the deliverability of these improvements is uncertain also the funding.

The area of land that is proposed to be safeguarded is to the south of the railway line and the A4, but it is considered that this would lead to coalescence issues with Saltford (Area C1), could also increase propensity for commuting given proximity to AR corridor and therefore Bath and Bristol. There is no capacity to expand the primary school and consequently a new primary school would be required, but this is still assessed as a positive. There is no justification for safeguarding this area in Annex O.

The justification for safeguarded land at east Keynsham cannot be supported in what is acknowledged to be a highly sensitive part of the Bristol Bath Green Belt i.e. the Keynsham –Saltford gap. Transport capacity limits the acceptable amount of development and there is no overriding evidence that these constraints can be overcome during the plan period. (BNES 51 para 3.46 and BNES 47 para 5.19.)

It is noted that the Site Appraisals, (Annex O) have helped to identify more specifically the areas with good potential to link to existing communities to promote vibrant and cohesive communities. They also help to avoid the areas without physical links or good potential to be linked by public transport or areas with disproportionality high infrastructure costs. However, this has not translated into any land being safeguarded apart from at East Keynsham and even this area the justification appears to be weak as it is reliant on necessary transport improvements in the A4 corridor - only when these have been secured will development be permitted.

Annex O the Green Belt Site Allocations Sustainability Appraisal is an addendum to the SA Report Annex L. However, it does not consider the issue of safeguarded land in the Green Belt. Consequently the schedule of amendments fails to address the strategic matter of safeguarded land.

The potential of South West Keynsham was acknowledged in BNES 47 para 5.20 dated 13th September 2013, yet by the time the Consultation on the Schedule of Proposed Amendments is produced on 11th November 2013 the position is reversed. In BNES 47 "the extent of development at land south west of Keynsham is constrained by the need to avoid impacting southwards onto Chew valley and also the need to limit the impact of traffic worsening congestion on the town centre. However, through the Placemaking Plan, the council is investigating options to continue the regeneration of the town centre and this, alongside the River Strategy which is investigating the reconfiguration of land uses in north Keynsham, may ease some of the problems of through traffic. In light of the fact that the Arup Concept Options work indicates that there may be scope for a greater level of development and because of the conclusions of the green belt assessment, the council concluded that there may be scope to identify SGL."

Both in ID 36 and ID 40 the Inspector has commented on the failure of the plan to address the issue of safeguarded land. In para 16 of ID 36 the Inspector has commented that the plan needs to provide a strategic steer and that the issue of safeguarded land is a strategic matter which the Core Strategy should be addressing so that the Place-making Plan has a clear outcome to delivery.

### Change to the policy requested:

A comprehensive review of safeguarding land should be undertaken in accordance with the NPPF para 85, it is not sound to delay this issue until the review. The approach to safeguarding land should meet longer term development needs stretching beyond the plan period. Safeguarded land can only be granted following a review of the Local Plan.

**Respondent Number:** 184 **Comment Number:** 7 **Respondent Name:** Paul Davis

**Respondent Organisation:** Persimmon Homes  
Severn Valley

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

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Persimmon Homes Severn Valley do not accept that there is no scope to identify safeguarded land in South West Keynsham. For the reasons set out in our comments on CSA 37, if the land West of Charlton Road is not included as part of the South West Keynsham allocation in the current plan, it could be identified as safeguarded land for the future. However, PHSV consider there is a need to release the land now in order to meet housing needs and to ensure a viable Green Belt release of land South West of Keynsham which would be of an appropriate size to be released from the Green Belt rather than instituting an incremental change to the Green Belt boundary.

**Change to the policy requested:****Respondent Number:** 216 **Comment Number:** 7 **Respondent Name:** Mr & Mrs Hawkes**Respondent Organisation:** Crest Homes (SW)**Agent ID:** 174 **Agent Name:** Pegasus Planning Group**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA50**Location:****Comment made on the Proposed Change:**Support: 

Statements in paragraph 6.63A about the scope for identifying safeguarded land to meet future development requirements are not justified or sound when assessed against the NPPF in particular para 85.. They are based on an inadequate assessment of future housing requirements and do not follow the approach of the NPPF paragraph 85 of safeguarding land to meet longer-term development needs stretching well beyond the plan period. For example, there is no logic in the statement that the need and scope for safeguarded land at Whitchurch will be considered in a future Core Strategy review.

The Sustainability Appraisal Addendum Report CD10/A1/1 does not provide any analysis of safeguarding land in any location. It does however, acknowledge in paragraph 4.2 in the context of Policy DW1 that: "Safeguarded land for future development would have major positive effects on meeting social and economic objectives in that it gives a degree of certainty about continuity of housing provision."

It is noted that the Site Appraisals, (Annex O) have helped to identify more specifically the areas with good potential to link to existing communities to promote vibrant and cohesive communities. They also help to avoid the areas without physical links or good potential to be linked by public transport or areas with disproportionality high infrastructure costs. However, this has not translated into any land being safeguarded apart from at East Keynsham and even this area the justification appears to be weak as it is reliant on necessary transport improvements in the A4 corridor - only when these have been secured will development be permitted.

Annex O the Green Belt Site Allocations Sustainability Appraisal is an addendum to the SA Report Annex L. However, it does not consider the issue of safeguarded land in the Green Belt. Consequently the schedule of amendments fails to address the strategic matter of safeguarded land in a consistent manner; only land to the east of Keynsham is to be safeguarded.

The Council have indicated in some areas that the safeguarding issue will be addressed in a review of the Core Strategy, however there is no certainty over the timing of this review i.e. when it will be undertaken, particularly as the Council indicate that the first review will be timed to enable co-ordination with the review of the core strategies of adjoining authorities in the West of England. Whilst the Duty to Co-operate appears as a standing item on the West of England Planning Housing and Communities Board agenda, there is no commitment to any timetable for the review of Core Strategies and much will depend on the outcomes of the Joint SHMA which has been commissioned, but it is not expected

to report until autumn 2014, and even then these will only be draft findings.

The Inspector continues to raise concerns about safeguarded land in ID 40 paragraphs 24 - 25. The Council acknowledges in BANES 51 paragraph 3.5 "that its proposed approach could be dependent on an external trigger for additional housing land such as the need to accommodate needs from Bristol. Such a requirement may not be forthcoming leaving the issue of safeguarded land in BANES unaddressed. It has therefore given the matter further consideration in the BANES context as part of the assessment of the allocation of sites below."

The approach to safeguarded land is inconsistent with comments made by the Council about the review of Green Belt in the Hicks Gate area. Paragraphs 5.24 and 5.25 of Annex 1 to the March 2013 Council Report stated that development at Hicks Gate would be appropriate only if it were to be developed comprehensively in conjunction with sites in Bristol and 'In the event that Bristol concludes in the planned review of their Core Strategy that their contingency at Hicks Gate is required to meet housing needs, then reconsideration of the land on the B&NES side of the boundary will need to be addressed in conjunction with Bristol.'

The Inspector for the Bristol Core Strategy concluded: 'There are no other realistically available sources of housing land supply within the city to increase housing provision other than the Green Belt...' (and) '...A cross-boundary approach would ensure that the size and form of any urban extension(s) was properly planned to maximise sustainability, rather than being determined by the rather irregular shape of Bristol City's administrative boundary.'

A logical conclusion is that, if land at Hicks Gate is not allocated for immediate release from the Green Belt – which we believe would be the proper response to Bristol's housing needs – then land at Hicks Gate should be safeguarded for future release in conjunction with Bristol's Core Strategy Review in 2016, by means of a partial review of the B&NES Core Strategy. A policy statement in the B&NES Core Strategy should designate land at Hicks Gate – as identified in the attached plan – as safeguarded land for early release from the Green Belt.

**Change to the policy requested:**

A comprehensive review of safeguarding land should be undertaken in accordance with the NPPF paragraph 8. It is not sound to delay this issue until the review. The approach to safeguarding land should meet longer term development needs stretching beyond the plan period. Safeguarded land can only be granted following a review of the Local Plan.

If land at Hicks Gate is not allocated for immediate release from the Green Belt – which we believe would be the proper response to Bristol's housing needs – then land at Hicks Gate should be safeguarded for future release in conjunction with Bristol's Core Strategy Review in 2016, by means of a partial review of the B&NES Core Strategy.

**Respondent Number:** 219 **Comment Number:** 7 **Respondent Name:** Edward Ware Homes Limited **Respondent Organisation:**

**Agent ID:** 165 **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA50

**Location:**

**Comment made on the Proposed Change:**

Support:

Statements in paragraph 6.63A about the scope for identifying safeguarded land to meet future development requirements are not justified or sound when assessed against the NPPF in particular para 85.. They are based on an inadequate assessment of future housing requirements and do not follow the approach of the NPPF paragraph 85 of safeguarding land to meet longer-term development needs stretching well beyond the plan period. For example, there is no logic in the statement that the need and scope for safeguarded land at Whitchurch will be considered in a future Core Strategy review.

The Sustainability Appraisal Addendum Report CD10/A1/1 does not provide any analysis of safeguarding land in any location. It does however, acknowledge in paragraph 4.2 in the context of Policy DW1 that: "Safeguarded land for future development would have major positive effects on meeting social and economic objectives in that it gives a degree of certainty about continuity of housing provision."

It is noted that the Site Appraisals, (Annex O) have helped to identify more specifically the areas with good potential to link to existing communities to promote vibrant and cohesive communities. They also help to avoid the areas without physical links or good potential to be linked by public transport or areas with disproportionately high infrastructure costs. However, this has not translated into any land being safeguarded apart from at East Keynsham and even this area the justification appears to be weak as it is reliant on necessary transport improvements in the A4 corridor - only when these have been secured will development be permitted.

Annex O the Green Belt Site Allocations Sustainability Appraisal is an addendum to the SA Report Annex L. However, it does not consider the issue of safeguarded land in the Green Belt. Consequently the schedule of amendments fails to address the strategic matter of safeguarded land in a consistent manner; only land to the east of Keynsham is to be safeguarded.

The Council have indicated in some areas that the safeguarding issue will be addressed in a review of the Core Strategy, however there is no certainty over the timing of this review i.e. when it will be undertaken, particularly as the Council indicate that the first review will be timed to enable co-ordination with the review of the core strategies of adjoining authorities in the West of England. Whilst the Duty to Co-operate appears as a standing item on the West of England Planning Housing and Communities Board agenda, there is no commitment to any timetable for the review of Core Strategies and much will depend on the outcomes of the Joint SHMA which has been commissioned, but it is not expected to report until autumn 2014, and even then these will only be draft findings.

The Inspector continues to raise concerns about safeguarded land in ID 40 paragraphs 24 - 25. The Council acknowledges in BANES 51 paragraph 3.5 "that its proposed approach could be dependent on an external trigger for additional housing land such as the need to accommodate needs from Bristol. Such a requirement may not be forthcoming leaving the issue of safeguarded land in BANES unaddressed. It has therefore given the matter further consideration in the BANES context as part of the assessment of the allocation of sites below."

The approach to safeguarded land is inconsistent with comments made by the Council about the review of Green Belt in the Hicks Gate area. Paragraphs 5.24 and 5.25 of Annex 1 to the March 2013 Council Report stated that development at Hicks Gate would be appropriate only if it were to be developed comprehensively in conjunction with sites in Bristol and 'In the event that Bristol concludes in the planned review of their Core Strategy that their contingency at Hicks Gate is required to meet housing needs, then reconsideration of the land on the B&NES side of the boundary will need to be addressed in conjunction with Bristol.'

The Inspector for the Bristol Core Strategy concluded: 'There are no other realistically available sources of housing land supply within the city to increase housing provision other than the Green Belt...' (and) '...A cross-boundary approach would ensure that the size and form of any urban extension(s) was properly planned to maximise sustainability, rather than being determined by the rather irregular shape of Bristol City's administrative boundary.'

A logical conclusion is that, if land at Hicks Gate is not allocated for immediate release from the Green Belt – which we believe would be the proper response to Bristol's housing needs – then land at Hicks Gate should be safeguarded for future release in conjunction with Bristol's Core Strategy Review in 2016, by means of a partial review of the B&NES Core Strategy. A policy statement in the B&NES Core Strategy should designate land at Hicks Gate – as identified in the attached plan – as safeguarded land for early release from the Green Belt.

**Change to the policy requested:**

A comprehensive review of safeguarding land should be undertaken in accordance with the NPPF paragraph 8. It is not sound to delay this issue until the review. The approach to safeguarding land should meet longer term development needs stretching beyond the plan period. Safeguarded land can only be granted following a review of the Local Plan.

If land at Hicks Gate is not allocated for immediate release from the Green Belt – which we believe would be the proper response to Bristol's housing needs – then land at Hicks Gate should be safeguarded for future release in conjunction with Bristol's Core Strategy Review in 2016, by means of a partial review of the B&NES Core Strategy.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 246 **Comment** 16 **Respondent**  
**Number:** **Number:** **Name:****Respondent** Combe Hay Parish  
**Organisation:** Council**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA50**Location:** Land adjoining Odd Down**Comment made on the Proposed Change:**Support: 

Please see Combe Hay Parish Council's letter G3420 which is attached to the Comment Form Part 2 regarding CSA 22.

**Change to the policy requested:**

Delete the reference to Odd Down.

**Respondent** 248 **Comment** 6 **Respondent**  
**Number:** **Number:** **Name:****Respondent** Crest Strategic Projects  
**Organisation:****Agent ID:** 30 **Agent Name:** RPS Planning & Development**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA50**Location:****Comment made on the Proposed Change:**Support: 

1) The whole premise of this CS is that it can only proceed to adoption on the basis that there is an immediate review so that the duty to cooperate can be engaged and the failings of all four West of England authorities can be addressed. We see that in CSA50 where there is reliance on the review to resolve the long term Green Belt boundary issue.

2) We have been here before many times. The Modifications to the Bristol Site Allocations DPD (attached), which was examined in November 2013 now states at paragraph 1.13 that:  
"The Core Strategy includes an interim review date of 2016 and a major review date of 2021. In particular, the appropriate level of new homes will be reviewed within 5 years of the adoption of the Core Strategy, by June 2016. Review processes are anticipated to commence at least two years in advance of the review date in order to allow any new policies to be adopted in a timely manner."

3) It is difficult not express a degree of incredulity that B&NES cannot even align itself to this intention, nevermind actually fulfil the requirements of the duty to cooperate when the time requires. Paragraph 7.05d suggests that the review will happen 'in around 2016'. No, the reviews will be adopted by 2016. It is hard not to be somewhat sceptical that once a B&NES CS is in place to 2029, there is little or no incentive to get involved in any duty to cooperate process even if Bristol City Council is knocking on the door. It would be no different to the response B&NES got from Bristol through this process. There is no requirement for B&NES to cooperate under the terms of the current wording. The revised LDS suggests that the review of the plan will not be in place by 2018 at best; this is completely unacceptable and completely at odds with the Bristol timetable. Bristol cannot achieve its aims if BANES is not working to the same timetable.

4) The only true means to ensure B&NES does cooperate is to find this plan unsound for the reasons expressed in the response to CSA6/14.

5) If the plan is to proceed to adoption then it can only do so if robust contingencies are in place to provide for any failure to review appropriately (appreciating that this would require re-consultation and the Inspector has already expressed doubts whether further rounds of consultation would be acceptable). Beyond that is the need to consider the NPPF requirements for safeguarding land in the Green Belt. These issues have been rehearsed at length but remain valid today.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

6) There is no flexibility in the plan to deal with changing circumstances; contingencies are required and a greater level of safeguarding land from the Green Belt has to be made in accordance with NPPF paragraph 83. We have already seen in the examination on 11/12 December that the 'buffer' BANES relies on to justify that it has a flexible plan is already shrinking where the need figure has increased from 8,727 to 10,167. The plan is unsound since this will require further major modifications.

7) Paragraphs 7.05e and f are confused. This Core Strategy has to make clear it is only an interim position, and only allowed to proceed to this point because of the need to commit to a review. It is well established that a B&NES only SHMA could only be considered appropriate in the context of an immediate review. The B&NES own SHMA identifies two clear HMAs affecting the District which no objector has sought to contradict. There are two possible outcomes to the West of England SHMA process, either it finds that the entirety of B&NES forms part of a wider West of England HMA, or indeed that there are two separate Bristol and Bath HMAs. On no account will it exclude B&NES in its entirety as that would be absurd.

8) B&NES cannot escape from the fact that the Bristol HMA influences a large part of the B&NES district (if not all). It is unhelpful to suggest otherwise and B&NES simply has to accept that it needs to review its CS in line with the other West of England authorities.

9) There has to be a 'stick' with which to compel BANES to act responsibly when the Duty to Cooperate is engaged; the wording set out below will go some way to achieving that.

**Change to the policy requested:**

**Respondent Number:** 269    **Comment Number:** 7    **Respondent Name:**    **Respondent Organisation:** Barratt Homes Ltd

**Agent ID:** 174    **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA50

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Statements in paragraph 6.63A about the scope for identifying safeguarded land to meet future development requirements are not justified or sound when assessed against the NPPF in particular para 85.. They are based on an inadequate assessment of future housing requirements and do not follow the approach of the NPPF paragraph 85 of safeguarding land to meet longer-term development needs stretching well beyond the plan period. For example, there is no logic in the statement that the need and scope for safeguarded land at Whitchurch will be considered in a future Core Strategy review.

The Sustainability Appraisal Addendum Report CD10/A1/1 does not provide any analysis of safeguarding land in any location. It does however, acknowledge in paragraph 4.2 in the context of Policy DW1 that: "Safeguarded land for future development would have major positive effects on meeting social and economic objectives in that it gives a degree of certainty about continuity of housing provision."

It is noted that the Site Appraisals, (Annex O) have helped to identify more specifically the areas with good potential to link to existing communities to promote vibrant ant cohesive communities. They also help to avoid the areas without physical links or good potential to be linked by public transport or areas with disproportionality high infrastructure costs. However, this has not translated into any land being safeguarded apart from at East Keynsham and even this area the justification appears to be weak as it is reliant on necessary transport improvements in the A4 corridor - only when these have been secured will development be permitted.

Annex O the Green Belt Site Allocations Sustainability Appraisal is an addendum to the SA Report Annex L. However, it does not consider the issue of safeguarded land in the Green Belt. Consequently the schedule of amendments fails to

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

address the strategic matter of safeguarded land in a consistent manner; only land to the east of Keynsham is to be safeguarded.

The Council have indicated in some areas that the safeguarding issue will be addressed in a review of the Core Strategy, however there is no certainty over the timing of this review i.e. when it will be undertaken, particularly as the Council indicate that the first review will be timed to enable co-ordination with the review of the core strategies of adjoining authorities in the West of England. Whilst the Duty to Co-operate appears as a standing item on the West of England Planning Housing and Communities Board agenda, there is no commitment to any timetable for the review of Core Strategies and much will depend on the outcomes of the Joint SHMA which has been commissioned, but it is not expected to report until autumn 2014, and even then these will only be draft findings.

The Inspector continues to raise concerns about safeguarded land in ID 40 paragraphs 24 - 25. The Council acknowledges in BANES 51 paragraph 3.5 "that its proposed approach could be dependent on an external trigger for additional housing land such as the need to accommodate needs from Bristol. Such a requirement may not be forthcoming leaving the issue of safeguarded land in BANES unaddressed. It has therefore given the matter further consideration in the BANES context as part of the assessment of the allocation of sites below."

See also comments on CSA 8

### Change to the policy requested:

A comprehensive review of safeguarding land should be undertaken in accordance with the NPPF paragraph 8. It is not sound to delay this issue until the review. The approach to safeguarding land should meet longer term development needs stretching beyond the plan period. Safeguarded land can only be granted following a review of the Local Plan.

**Respondent Number:** 4803 **Comment Number:** 10 **Respondent Name:** Simon Steel-Perkins

**Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA50

**Location:**

### Comment made on the Proposed Change:

**Support:**

20. The plan and amendments are only identifying only very limited amounts of safeguarded land for development beyond the plan period, and these areas do not go far enough to ensure the green belt boundary will not need to be altered at the end of the development plan period. The NPPF makes clear that when defining green belt boundaries authorities should 'identify safeguarded land in order to meet the longer-term development needs stretching well beyond the plan period'.

### Change to the policy requested:

## Change Reference: CSA51

**Respondent Number:** 216 **Comment Number:** 8 **Respondent Name:** Mr & Mrs Hawkes

**Respondent Organisation:** Crest Homes (SW)

**Agent ID:** 174 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA51

**Location:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

Paragraph 6.64 proposes that there is no need to review the inner Green Belt/settlement boundaries of inset villages. In view of the scale of housing need in B&NES and Bristol, it is an extraordinary assertion that 'given the overall level of housing required during the plan period and the spatial strategy for meeting this requirement it is not considered that exceptional circumstances exist to warrant changing the inset boundaries for these villages.' We have explained in comments on other proposed changes why proposed housing provision is inadequate and why a broader portfolio of sites is required.

It is not clear why settlement boundaries that were defined many years ago should be regarded as immutable for the next 18 years. Nor is it obvious why sites promoted through the Community Right to Build would be more acceptable in the Green Belt.

In ID/40, the Inspector suggested that an allowance could be made for non-strategic Green Belt sites on the basis of site assessments in the SHLAA. It is not at all clear how this would work, as sites identified as suitable in all other respects in the SHLAA have been eliminated from further consideration if they are in the Green Belt and it is not clear how they could be considered in the Placemaking Plan as 'anomalies or other necessary adjustments' if the general extent of the Green Belt is to be retained.

If sites for fewer than 150 dwellings are not identified in the Core Strategy for release from the Green Belt, there is a need for a policy statement that Green Belt boundaries at specified settlements can be reviewed in the Placemaking Plan.

**Change to the policy requested:**

A more comprehensive review of the Green Belt is required on the basis of a robust assessment of future housing requirements, based on a long-term view of trends in migration, household formation and economic activity and on a full consideration of the impacts of housing demand in adjoining districts – in particular Bristol.

The review should include the strategic location of Hicks Gate because of its close relationship with Bristol and allocate or otherwise identify opportunities for a portfolio of smaller sites to be released from the Green Belt at other significant settlements such as Keynsham, Saltford and the Somer Valley towns

**Respondent Number:** 219    **Comment Number:** 8    **Respondent Name:** Edward Ware Homes Limited    **Respondent Organisation:**

**Agent ID:** 165    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** CSA51**Location:****Comment made on the Proposed Change:**Support: 

Paragraph 6.64 proposes that there is no need to review the inner Green Belt/settlement boundaries of inset villages. In view of the scale of housing need in B&NES and Bristol, it is an extraordinary assertion that 'given the overall level of housing required during the plan period and the spatial strategy for meeting this requirement it is not considered that exceptional circumstances exist to warrant changing the inset boundaries for these villages.' We have explained in comments on other proposed changes why proposed housing provision is inadequate and why a broader portfolio of sites is required.

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**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

Belt is to be retained.

If sites for fewer than 150 dwellings are not identified in the Core Strategy for release from the Green Belt, there is a need for a policy statement that Green Belt boundaries at specified settlements can be reviewed in the Placemaking Plan.

**Change to the policy requested:**

A more comprehensive review of the Green Belt is required on the basis of a robust assessment of future housing requirements, based on a long-term view of trends in migration, household formation and economic activity and on a full consideration of the impacts of housing demand in adjoining districts – in particular Bristol.

The review should include the strategic location of Hicks Gate because of its close relationship with Bristol and allocate or otherwise identify opportunities for a portfolio of smaller sites to be released from the Green Belt at other significant settlements such as Keynsham, Saltford and the Somer Valley towns.

**Respondent Number:** 269 **Comment Number:** 8 **Respondent Name:** Pegasus Planning Group  
**Agent ID:** 174 **Agent Name:** Pegasus Planning Group

**Respondent Organisation:** Barratt Homes Ltd

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA51

**Location:**

**Comment made on the Proposed Change:**

Support:

Paragraph 6.64 proposes that there is no need to review the inner Green Belt/settlement boundaries of inset villages. In view of the scale of housing need in B&NES and Bristol, it is an extraordinary assertion that 'given the overall level of housing required during the plan period and the spatial strategy for meeting this requirement it is not considered that exceptional circumstances exist to warrant changing the inset boundaries for these villages.' We have explained in comments on other proposed changes why proposed housing provision is inadequate and why a broader portfolio of sites is required.

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**Change to the policy requested:**

A more comprehensive review of the Green Belt is required on the basis of a robust assessment of future housing requirements, based on a long-term view of trends in migration, household formation and economic activity and on a full consideration of the impacts of housing demand in adjoining districts – in particular Bristol.

The review should identify opportunities for a portfolio of smaller sites to be released from the Green Belt at other significant settlements such as Keynsham, Saltford and the Somer Valley towns.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 4788 **Comment** 8 **Respondent** Stratland LLP  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** 182 **Agent Name:** Stratland LLP**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA51**Location:****Comment made on the Proposed Change:**Support: 

Paragraph 6.64 proposes that there is no need to review the inner Green Belt/settlement boundaries of inset villages. In view of the scale of housing need in B&NES and Bristol, it is an extraordinary assertion that 'given the overall level of housing required during the plan period and the spatial strategy for meeting this requirement it is not considered that exceptional circumstances exist to warrant changing the inset boundaries for these villages.' We have explained in comments on other proposed changes why proposed housing provision is inadequate and why a broader portfolio of sites is required.

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**Change to the policy requested:**

A more comprehensive review of the Green Belt is required on the basis of a robust assessment of future housing requirements, based on a long-term view of trends in migration, household formation and economic activity and on a full consideration of the impacts of housing demand in adjoining districts – in particular Bristol.

The review should include the strategic location of Hicks Gate because of its close relationship with Bristol and allocate or otherwise identify opportunities for a portfolio of smaller sites to be released from the Green Belt at other significant settlements such as Keynsham, Saltford and the Somer Valley towns.

**Change Reference: CSA53****Respondent** 170 **Comment** 11 **Respondent** Robert Hitchins Ltd  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** 19 **Agent Name:** Pegasus Planning Group**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA53**Location:****Comment made on the Proposed Change:**Support: 

If there is a commitment to co-ordinate a review the Core Strategy with reviews of the Core Strategies of adjoining Authorities in the West of England, in the light of the Duty to Co-operate, and to take account of the West of England Strategic Economic Plan, the distinctions in paragraphs 7.05e and 7.05f are irrelevant as it will be necessary to make a co-

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

ordinated response to the outputs of the updated SHMA, whatever housing market areas are defined.

The NPPF is clear that plans need to be kept up to date, "Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances."

The NPPG states that "To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years."

The issue with the wording as current proposed is that it is not clear when the review will commence ( obviously a date is dependent on how long it takes to produce the plan), para 7.05 states that the Core Strategy is programmed to be reviewed about every 5 years. "About" is too vague and given local council elections etc the timetable for reviews slips. Recent experience of an Inspector's report following an inquiry in summer to 2012, the Inspector produced a report in Jan 2013, the Council had agreed to an early review of the plan to address growth that should have been in the Core Strategy and to work with neighbouring authorities, they also agreed a SADPD to meet the shortfall in the CS, however both documents have been delayed until June/July - some 2 years after the Examination.

The proposed wording to para 7.05 states that in light of the Duty to Co-operate the first review will be timed to enable co-ordination with the review of the Core Strategies of adjoining Authorities in the West of England.

However, this does not have to depend on when other authorities commence their review. The Inspector for South Gloucestershire has concluded in paragraph 87 of his report:

"The outcome of the SHMA process also provides an opportunity for the Council to work with the other West of England Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region. While the authorities are at different stages in plan-making and plan review activities I do not consider this invalidates such an approach, particularly as each authority will have to have regard to the Duty to Cooperate."

The Inspector for South Gloucestershire has recognised that an early review is necessary in their case and has stated that South Gloucestershire should aim to adopt a replacement plan as soon as reasonably possible and given the timetable for the newly instigated SHMA process this means that the review can be brought forward so that a review/replacement plan is in place by the end of 2018.

Giving a precise date when the plan should be in place is helpful and provides some certainty in terms of the timetable and expectations.

### Change to the policy requested:

A precise date when the review of the plan will be in place is required to provide some certainty in the plan making process and to enable monitoring of the implementation of the plan.

**Respondent Number:** 180  
**Comment Number:** 14  
**Respondent Name:**

**Respondent Organisation:** J S Bloor Ltd

**Agent ID:** 19 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA53

**Location:**

### Comment made on the Proposed Change:

Support:

If there is a commitment to co-ordinate a review the Core Strategy with reviews of the Core Strategies of adjoining Authorities in the West of England, in the light of the Duty to Co-operate, and to take account of the West of England Strategic Economic Plan, the distinctions in paragraphs 7.05e and 7.05f are irrelevant as it will be necessary to make a co-ordinated response to the outputs of the updated SHMA, whatever housing market areas are defined.

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

The NPPF is clear that plans need to be kept up to date, "Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances."

The NPPG states that "To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years."

The issue with the wording as current proposed is that it is not clear when the review will commence (obviously a date is dependent on how long it takes to produce the plan), para 7.05 states that the Core Strategy is programmed to be reviewed about every 5 years. "About" is too vague and given local council elections etc the timetable for reviews slips. Recent experience of an Inspector's report following an inquiry in summer to 2012, the Inspector produced a report in Jan 2013, the Council had agreed to an early review of the plan to address growth that should have been in the Core Strategy and to work with neighbouring authorities, they also agreed a SADPD to meet the shortfall in the CS, however both documents have been delayed until June/July - some 2 years after the Examination.

The proposed wording to para 7.05 states that in light of the Duty to Co-operate the first review will be timed to enable co-ordination with the review of the Core Strategies of adjoining Authorities in the West of England.

However, this does not have to depend on when other authorities commence their review. The Inspector for South Gloucestershire has concluded in paragraph 87 of his report:

"The outcome of the SHMA process also provides an opportunity for the Council to work with the other West of England Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region. While the authorities are at different stages in plan-making and plan review activities I do not consider this invalidates such an approach, particularly as each authority will have to have regard to the Duty to Cooperate."

The Inspector for South Gloucestershire has recognised that an early review is necessary in their case and has stated that South Gloucestershire should aim to adopt a replacement plan as soon as reasonably possible and given the timetable for the newly instigated SHMA process this means that the review can be brought forward so that a review/replacement plan is in place by the end of 2018.

Giving a precise date when the plan should be in place is helpful and provides some certainty in terms of the timetable and expectations.

### Change to the policy requested:

A precise date when the review of the plan will be in place is required to provide some certainty in the plan making process and to enable monitoring of the implementation of the plan.

**Respondent Number:** 184 **Comment Number:** 8 **Respondent Name:** Paul Davis

**Respondent Organisation:** Persimmon Homes Severn Valley

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA53

**Location:**

### Comment made on the Proposed Change:

Support:

Persimmon Homes Severn Valley considers there is a conflict between amendment to paragraph 7.05 which says the Core Strategy will be reviewed 'about every 5 years' with the amendment in CSA 14 to policy DW1 which says 'the first review will be timed to co ordinate with the review of the West of England Core Strategies in around 2016'. PHSV consider that it is CSA 53 which needs amending and it is important that an early review of the plan is carried out coordinated with the West of England SHMA and the review of other Core Strategies in the West of England to ensure housing needs in the

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total market area are met.

We support the approach of the South Gloucestershire Core Strategy Inspector He said in paragraph 86 of this report 'I therefore consider South Gloucestershire should aim to adopt a replacement plan as soon as possible' and 'the timetable for the newly instigated SHMA process means this can and should be brought forward so that a review/replacement plan is in place by the end of 2018' PHSV commend a similar approach here to provide a consistent approach.

The amendment also says that the review will be informed by regular monitoring as set out in table 9 as well as ensuring that the Core Strategy evidence base remains up to date. However, neither this nor the monitoring indicators in table 9 refer to reviewing objectively assessed housing needs as distinct from housing supply. This continuous review of housing needs is also required and should be included within table 9.

**Change to the policy requested:**

1. A Policy Commitment for a plan review to be completed by 2018.
2. Include a review of objectively assessed housing needs in table 9.

**Respondent Number:** 216 **Comment Number:** 9 **Respondent Name:** Mr & Mrs Hawkes

**Respondent Organisation:** Crest Homes (SW)

**Agent ID:** 174 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA53

**Location:**

**Comment made on the Proposed Change:**

**Support:**

If there is a commitment to co-ordinate a review the Core Strategy with reviews of the Core Strategies of adjoining Authorities in the West of England, in the light of the Duty to Co-operate, and to take account of the West of England Strategic Economic Plan, the distinctions in paragraphs 7.05e and 7.05f are irrelevant as it will be necessary to make a co-ordinated response to the outputs of the updated SHMA, whatever housing market areas are defined.

The NPPF is clear that plans need to be kept up to date, "Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances."

The NPPG states that "To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years."

The issue with the wording as current proposed is that it is not clear when the review will commence (obviously a date is dependent on how long it takes to produce the plan). Paragraph 7.05 states that the Core Strategy is programmed to be reviewed about every 5 years. "About" is too vague and given local council elections etc the timetable for reviews slips. Recent experience of an Inspector's report following an inquiry in summer 2012, the Inspector produced a report in Jan 2013, the Council had agreed to an early review of the plan to address growth that should have been in the Core Strategy and to work with neighbouring authorities, they also agreed a SADPD to meet the shortfall in the CS, however both documents have been delayed until June/July - some 2 years after the Examination.

The proposed wording to paragraph 7.05 states that in light of the Duty to Co-operate the first review will be timed to enable co-ordination with the review of the Core Strategies of adjoining Authorities in the West of England.

However, this does not have to depend on when other authorities commence their review. The Inspector for South Gloucestershire has concluded in paragraph 87 of his report:

'The outcome of the SHMA process also provides an opportunity for the Council to work with the other West of England Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region. While the authorities are at different stages in plan-making

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and plan review activities I do not consider this invalidates such an approach, particularly as each authority will have to have regard to the Duty to Cooperate.'

The Inspector for South Gloucestershire has recognised that an early review is necessary in their case and has stated that South Gloucestershire should aim to adopt a replacement plan as soon as reasonably possible and given the timetable for the newly instigated SHMA process this means that the review can be brought forward so that a review/replacement plan is in place by the end of 2018.

Giving a precise date when the plan should be in place is helpful and provides some certainty in terms of the timetable and expectations.

See also comments on CSA 13

### Change to the policy requested:

The Core Strategy should include a clear programme for review which will need to conform to the 'Duty to Co-operate', which is not dependent on the definition of housing market areas. Paragraphs 7.05e and f should be redrafted as a single statement:

'Following a strategic housing market assessment of the West of England, B&NES will work closely with adjoining authorities to ensure that their local plans jointly make provision for the full objectively assessed housing needs of the housing market area, by co-ordinating reviews of their local plans to address housing allocations and review of green belt, for submission in 2016.'

**Respondent Number:** 219 **Comment Number:** 9 **Respondent Name:** Edward Ware Homes Limited **Respondent Organisation:**

**Agent ID:** 165 **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA53

**Location:**

### Comment made on the Proposed Change:

Support:

If there is a commitment to co-ordinate a review the Core Strategy with reviews of the Core Strategies of adjoining Authorities in the West of England, in the light of the Duty to Co-operate, and to take account of the West of England Strategic Economic Plan, the distinctions in paragraphs 7.05e and 7.05f are irrelevant as it will be necessary to make a co-ordinated response to the outputs of the updated SHMA, whatever housing market areas are defined.

The NPPF is clear that plans need to be kept up to date, "Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances."

The NPPG states that "To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years."

The issue with the wording as current proposed is that it is not clear when the review will commence (obviously a date is dependent on how long it takes to produce the plan). Paragraph 7.05 states that the Core Strategy is programmed to be reviewed about every 5 years. "About" is too vague and given local council elections etc the timetable for reviews slips. Recent experience of an Inspector's report following an inquiry in summer 2012, the Inspector produced a report in Jan 2013, the Council had agreed to an early review of the plan to address growth that should have been in the Core Strategy and to work with neighbouring authorities, they also agreed a SADPD to meet the shortfall in the CS, however both documents have been delayed until June/July - some 2 years after the Examination.

The proposed wording to paragraph 7.05 states that in light of the Duty to Co-operate the first review will be timed to enable co-ordination with the review of the Core Strategies of adjoining Authorities in the West of England.

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However, this does not have to depend on when other authorities commence their review. The Inspector for South Gloucestershire has concluded in paragraph 87 of his report:

'The outcome of the SHMA process also provides an opportunity for the Council to work with the other West of England Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region. While the authorities are at different stages in plan-making and plan review activities I do not consider this invalidates such an approach, particularly as each authority will have to have regard to the Duty to Cooperate.'

The Inspector for South Gloucestershire has recognised that an early review is necessary in their case and has stated that South Gloucestershire should aim to adopt a replacement plan as soon as reasonably possible and given the timetable for the newly instigated SHMA process this means that the review can be brought forward so that a review/replacement plan is in place by the end of 2018.

Giving a precise date when the plan should be in place is helpful and provides some certainty in terms of the timetable and expectations.

See also comments on CSA 13

**Change to the policy requested:**

The Core Strategy should include a clear programme for review which will need to conform to the 'Duty to Co-operate', which is not dependent on the definition of housing market areas. Paragraphs 7.05e and f should be redrafted as a single statement:

'Following a strategic housing market assessment of the West of England, B&NES will work closely with adjoining authorities to ensure that their local plans jointly make provision for the full objectively assessed housing needs of the housing market area, by co-ordinating reviews of their local plans to address housing allocations and review of green belt, for submission in 2016.'

**Respondent Number:** 244 **Comment Number:** 5 **Respondent Name:**

**Respondent Organisation:** HBF - Home Builders Federation

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA53

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Finally under Change Reference CSA14 Policy DW1 Clause 9 and Change Reference CSA53 Paragraphs 7.05 – 7.05d, the Council sets out proposals for future reviews of the Core Strategy. An early review mechanism is an inappropriate remedy for an unsound plan. The proposed policy change in Policy DW1 Clause 9 is insufficient in its commitment to an early review to align with the review of neighbouring authorities Core Strategies and the work of the LEP on West of England SHMA. However it is understood that the appropriate wording for a policy on an early review will be discussed in further detail in the Examination Hearings in 2014.

**Change to the policy requested:**

**Respondent Number:** 269 **Comment Number:** 9 **Respondent Name:**

**Respondent Organisation:** Barratt Homes Ltd

**Agent ID:** 174 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA53

**Location:**

**Comment made on the Proposed Change:**Support: 

If there is a commitment to co-ordinate a review the Core Strategy with reviews of the Core Strategies of adjoining Authorities in the West of England, in the light of the Duty to Co-operate, and to take account of the West of England Strategic Economic Plan, the distinctions in paragraphs 7.05e and 7.05f are irrelevant as it will be necessary to make a co-ordinated response to the outputs of the updated SHMA, whatever housing market areas are defined.

The NPPF is clear that plans need to be kept up to date, "Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances."

The NPPG states that "To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years."

The issue with the wording as current proposed is that it is not clear when the review will commence (obviously a date is dependent on how long it takes to produce the plan). Paragraph 7.05 states that the Core Strategy is programmed to be reviewed about every 5 years. "About" is too vague and given local council elections etc the timetable for reviews slips. Recent experience of an Inspector's report following an inquiry in summer 2012, the Inspector produced a report in Jan 2013, the Council had agreed to an early review of the plan to address growth that should have been in the Core Strategy and to work with neighbouring authorities, they also agreed a SADPD to meet the shortfall in the CS, however both documents have been delayed until June/July - some 2 years after the Examination.

The proposed wording to paragraph 7.05 states that in light of the Duty to Co-operate the first review will be timed to enable co-ordination with the review of the Core Strategies of adjoining Authorities in the West of England.

However, this does not have to depend on when other authorities commence their review. The Inspector for South Gloucestershire has concluded in paragraph 87 of his report:

'The outcome of the SHMA process also provides an opportunity for the Council to work with the other West of England Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region. While the authorities are at different stages in plan-making and plan review activities I do not consider this invalidates such an approach, particularly as each authority will have to have regard to the Duty to Cooperate.'

The Inspector for South Gloucestershire has recognised that an early review is necessary in their case and has stated that South Gloucestershire should aim to adopt a replacement plan as soon as reasonably possible and given the timetable for the newly instigated SHMA process this means that the review can be brought forward so that a review/replacement plan is in place by the end of 2018.

Giving a precise date when the plan should be in place is helpful and provides some certainty in terms of the timetable and expectations.

See also comments on CSA 13

**Change to the policy requested:**

The Core Strategy should include a clear programme for review which will need to conform to the 'Duty to Co-operate', which is not dependent on the definition of housing market areas. Paragraphs 7.05e and f should be redrafted as a single statement:

'Following a strategic housing market assessment of the West of England, B&NES will work closely with adjoining authorities to ensure that their local plans jointly make provision for the full objectively assessed housing needs of the housing market area, by co-ordinating reviews of their local plans to address housing allocations and review of green belt, for submission in 2016.'

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**Respondent Number:** 275 **Comment Number:** 8 **Respondent Name:** Redrow Homes South West **Respondent Organisation:**

**Agent ID:** 164 **Agent Name:** DLP Planning Consultants

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA53

**Location:**

**Comment made on the Proposed Change:**

**Support:**

A clear and unequivocal commitment to Review the Core Strategy in the light of the West of England SHMA and in line with timetable to review of the other West of England Local Plans is the very minimum requirement.

**Change to the policy requested:**

This needs to be addressed in policy DW1 see above.

**Respondent Number:** 837 **Comment Number:** 20 **Respondent Name:** David Redgewell **Respondent Organisation:** Transport for Greater Bristol

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA53

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Duty to Cooperate with Wiltshire County, Somerset County Council, Mendip District Council.

The plan fails to framework the local transport Network around the West of England, Bristol / Bath city region through the West of England Partnership in terms of a frame work for new housing and employment around the Transport network. Bus services into western Wiltshire, Chippenham, Bradford-on-Avon, Trowbridge, Westbury, Warminster, Melksham, Frome in the Mendip District along with Shepton Mallet, Wells, Glastonbury, Street.

Including the Metro Rail Network to Keynsham (Oldfield Park / Bath Spa, Saltford and Bathampton new station into Freshford, Avoncliffe, Bradford-on-Avon, Trowbridge, Westbury, Warminster / Frome.

**Change to the policy requested:**

**Respondent Number:** 2564 **Comment Number:** 1 **Respondent Name:** **Respondent Organisation:** Strategic Land Partnerships

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA53

**Location:**

**Comment made on the Proposed Change:**

**Support:**

20.We are very concerned about the plan's approach to monitoring, review, delivery and growth targets. The plan and its amendments are inconsistent. On one hand it says that the plan will be reviewed every five years, but then it also now says the first review will be timed to enable coordination with the review of the Core Strategies of adjoining authorities in the West of England. This is essential and according to the Inspectors Report of the South Gloucestershire Core Strategy,

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is required to be done following the revised SHMA and is expected to be in 2016. This is considerably in advance of the five years currently set out in the first paragraph of 7.05.

21. Recognition in this plan that there are fundamental links with the West of England is welcomed and long overdue, as the Framework published in March 2012 requires it to be in the plan now. The timescales for this issue to be properly considered in the way the Council now suggests need to be set out.

22. Updated travel to work data which will be available next year should also be used to consider the extent of the Housing Market Areas and the functional relationship which exist between settlements. This is likely to demonstrate that commuting patterns are significant between some parts of BANES and Mendip, as well as Wiltshire. Settlements like Midsomer Norton have an important role to play on the edge of the District and day to day travel patterns have little respect for administrative boundaries. We would expect to see the plan recognise the importance of these issues and that collaboration and joint working to have been done with the adjacent authorities, particularly Mendip. The fact that the Housing Market Areas appear to have neatly fallen within district boundaries is very useful, but unlikely in reality. It is essential that these functional relationships are understood and investigated further through the reviews of the Housing Market Area that is required as soon as travel to work data becomes available next year.

**Change to the policy requested:**

**Respondent Number:** 2564 **Comment Number:** 10 **Respondent Name:**

**Respondent Organisation:** Strategic Land Partnerships

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA53

**Location:** Comment on multiple Strategic Sites

**Comment made on the Proposed Change:**

**Support:**

20. We are very concerned about the plan's approach to monitoring, review, delivery and growth targets. The plan and its amendments are inconsistent. On one hand it says that the plan will be reviewed every five years, but then it also now says the first review will be timed to enable coordination with the review of the Core Strategies of adjoining authorities in the West of England. This is essential and according to the Inspectors Report of the South Gloucestershire Core Strategy, is required to be done following the revised SHMA and is expected to be in 2016. This is considerably in advance of the five years currently set out in the first paragraph of 7.05.

21. Recognition in this plan that there are fundamental links with the West of England is welcomed and long overdue, as the Framework published in March 2012 requires it to be in the plan now. The timescales for this issue to be properly considered in the way the Council now suggests need to be set out.

22. Updated travel to work data which will be available next year should also be used to consider the extent of the Housing Market Areas and the functional relationship which exist between settlements. This is likely to demonstrate that commuting patterns are significant between some parts of BANES and Mendip, as well as Wiltshire. Settlements like Midsomer Norton have an important role to play on the edge of the District and day to day travel patterns have little respect for administrative boundaries. We would expect to see the plan recognise the importance of these issues and that collaboration and joint working to have been done with the adjacent authorities, particularly Mendip. The fact that the Housing Market Areas appear to have neatly fallen within district boundaries is very useful, but unlikely in reality. It is essential that these functional relationships are understood and investigated further through the reviews of the Housing Market Area that is required as soon as travel to work data becomes available next year.

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 4788 **Comment** 9 **Respondent** Stratland LLP  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** 182 **Agent Name:** Stratland LLP**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** CSA53**Location:****Comment made on the Proposed Change:**Support: 

If there is a commitment to co-ordinate a review the Core Strategy with reviews of the Core Strategies of adjoining Authorities in the West of England, in the light of the Duty to Co-operate, and to take account of the West of England Strategic Economic Plan, the distinctions in paragraphs 7.05e and 7.05f are irrelevant as it will be necessary to make a co-ordinated response to the outputs of the updated SHMA, whatever housing market areas are defined.

The NPPF is clear that plans need to be kept up to date, "Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances."

The NPPG states that "To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years."

The issue with the wording as current proposed is that it is not clear when the review will commence (obviously a date is dependent on how long it takes to produce the plan). Paragraph 7.05 states that the Core Strategy is programmed to be reviewed about every 5 years. "About" is too vague and given local council elections etc the timetable for reviews slips. Recent experience of an Inspector's report following an inquiry in summer 2012, the Inspector produced a report in Jan 2013, the Council had agreed to an early review of the plan to address growth that should have been in the Core Strategy and to work with neighbouring authorities, they also agreed a SADPD to meet the shortfall in the CS, however both documents have been delayed until June/July - some 2 years after the Examination.

The proposed wording to paragraph 7.05 states that in light of the Duty to Co-operate the first review will be timed to enable co-ordination with the review of the Core Strategies of adjoining Authorities in the West of England.

However, this does not have to depend on when other authorities commence their review. The Inspector for South Gloucestershire has concluded in paragraph 87 of his report:

'The outcome of the SHMA process also provides an opportunity for the Council to work with the other West of England Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region. While the authorities are at different stages in plan-making and plan review activities I do not consider this invalidates such an approach, particularly as each authority will have to have regard to the Duty to Cooperate.'

The Inspector for South Gloucestershire has recognised that an early review is necessary in their case and has stated that South Gloucestershire should aim to adopt a replacement plan as soon as reasonably possible and given the timetable for the newly instigated SHMA process this means that the review can be brought forward so that a review/replacement plan is in place by the end of 2018.

Giving a precise date when the plan should be in place is helpful and provides some certainty in terms of the timetable and expectations.

See also comments on CSA 13

**Change to the policy requested:**

The Core Strategy should include a clear programme for review which will need to conform to the 'Duty to Co-operate', which is not dependent on the definition of housing market areas. Paragraphs 7.05e and f should be redrafted as a single statement:

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'Following a strategic housing market assessment of the West of England, B&NES will work closely with adjoining authorities to ensure that their local plans jointly make provision for the full objectively assessed housing needs of the housing market area, by co-ordinating reviews of their local plans to address housing allocations and review of green belt, for submission in 2016.'

**Respondent Number:** 4788 **Comment Number:** 7 **Respondent Name:** Stratland LLP

**Respondent Organisation:**

**Agent ID:** 182 **Agent Name:** Stratland LLP

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA53

**Location:**

**Comment made on the Proposed Change:**

Support:

Statements in paragraph 6.63A about the scope for identifying safeguarded land to meet future development requirements are not justified or sound when assessed against the NPPF in particular para 85.. They are based on an inadequate assessment of future housing requirements and do not follow the approach of the NPPF paragraph 85 of safeguarding land to meet longer-term development needs stretching well beyond the plan period. For example, there is no logic in the statement that the need and scope for safeguarded land at Whitchurch will be considered in a future Core Strategy review.

The Sustainability Appraisal Addendum Report CD10/A1/1 does not provide any analysis of safeguarding land in any location. It does however, acknowledge in paragraph 4.2 in the context of Policy DW1 that: "Safeguarded land for future development would have major positive effects on meeting social and economic objectives in that it gives a degree of certainty about continuity of housing provision."

It is noted that the Site Appraisals, (Annex O) have helped to identify more specifically the areas with good potential to link to existing communities to promote vibrant ant cohesive communities. They also help to avoid the areas without physical links or good potential to be linked by public transport or areas with disproportionality high infrastructure costs. However, this has not translated into any land being safeguarded apart from at East Keynsham and even this area the justification appears to be weak as it is reliant on necessary transport improvements in the A4 corridor - only when these have been secured will development be permitted.

Annex O the Green Belt Site Allocations Sustainability Appraisal is an addendum to the SA Report Annex L. However, it does not consider the issue of safeguarded land in the Green Belt. Consequently the schedule of amendments fails to address the strategic matter of safeguarded land in a consistent manner; only land to the east of Keynsham is to be safeguarded.

The Council have indicated in some areas that the safeguarding issue will be addressed in a review of the Core Strategy, however there is no certainty over the timing of this review i.e. when it will be undertaken, particularly as the Council indicate that the first review will be timed to enable co-ordination with the review of the core strategies of adjoining authorities in the West of England. Whilst the Duty to Co-operate appears as a standing item on the West of England Planning Housing and Communities Board agenda, there is no commitment to any timetable for the review of Core Strategies and much will depend on the outcomes of the Joint SHMA which has been commissioned, but it is not expected to report until autumn 2014, and even then these will only be draft findings.

The Inspector continues to raise concerns about safeguarded land in ID 40 paragraphs 24 - 25. The Council acknowledges in BNES 51 paragraph 3.5 "that its proposed approach could be dependent on an external trigger for additional housing land such as the need to accommodate needs from Bristol. Such a requirement may not be forthcoming leaving the issue of safeguarded land in BANES unaddressed. It has therefore given the matter further consideration in the BANES context as part of the assessment of the allocation of sites below."

The approach to safeguarded land is inconsistent with comments made by the Council about the review of Green Belt in

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

the Hicks Gate area. Paragraphs 5.24 and 5.25 of Annex 1 to the March 2013 Council Report stated that development at Hicks Gate would be appropriate only if it were to be developed comprehensively in conjunction with sites in Bristol and 'In the event that Bristol concludes in the planned review of their Core Strategy that their contingency at Hicks Gate is required to meet housing needs, then reconsideration of the land on the B&NES side of the boundary will need to be addressed in conjunction with Bristol.'

The Inspector for the Bristol Core Strategy concluded: 'There are no other realistically available sources of housing land supply within the city to increase housing provision other than the Green Belt...' (and) '...A cross-boundary approach would ensure that the size and form of any urban extension(s) was properly planned to maximise sustainability, rather than being determined by the rather irregular shape of Bristol City's administrative boundary.'

A logical conclusion is that, if land at Hicks Gate is not allocated for immediate release from the Green Belt – which we believe would be the proper response to Bristol's housing needs – then land at Hicks Gate should be safeguarded for future release in conjunction with Bristol's Core Strategy Review in 2016, by means of a partial review of the B&NES Core Strategy. A policy statement in the B&NES Core Strategy should designate land at Hicks Gate – as identified in the attached plan – as safeguarded land for early release from the Green Belt.

### Change to the policy requested:

A comprehensive review of safeguarding land should be undertaken in accordance with the NPPF paragraph 8. It is not sound to delay this issue until the review. The approach to safeguarding land should meet longer term development needs stretching beyond the plan period. Safeguarded land can only be granted following a review of the Local Plan.

If land at Hicks Gate is not allocated for immediate release from the Green Belt – which we believe would be the proper response to Bristol's housing needs – then land at Hicks Gate should be safeguarded for future release in conjunction with Bristol's Core Strategy Review in 2016, by means of a partial review of the B&NES Core Strategy.

## Change Reference: CSA54

**Respondent Number:** 276 **Comment Number:** 5 **Respondent Name:** Mr Charles Hignett

**Respondent Organisation:** Hignett Family Trust

**Agent ID:** 123 **Agent Name:** Savills (L&P)

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** CSA54

**Location:** Land adjoining Odd Down

### Comment made on the Proposed Change:

Support:

Proposed Changes CSA6 and CSA54 reflect the Council's approach to the objectively assessed housing need and the housing land supply position.

For the reasons set out in our previous Representations and Position Statement for the Examination Session on 10 – 11 December 2013, we do not support the Council's assessment of the objectively assessed needs. We do not reiterate this evidence within these Representations or the assessment of the housing requirement which we support as an alternative to that within the Core Strategy. We trust these will be taken into consideration by the Inspector alongside any additional submissions in relation to the overall strategic housing requirement and the assessment of market and affordable housing need.

Putting to one side the evidence submitted in support of a higher housing requirement, we do not consider the 'disaggregated approach' is either justified or practicable.

It is our view that the market signals relating to matters such as house price increases and worsening affordability etc, strongly indicate that there is a substantial need for housing over and above the level derived from a forward projection of past (suppressed) population and household projections. Indeed, the significant need for affordable housing is, in itself, a strong indicator of the need to increase overall housing land supply. It is our view therefore that the housing

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

requirement should be considered in the round and, whatever figure is selected, this should represent the basis for calculating the five year housing land supply.

Notwithstanding the principles of this approach, in practice it would be very difficult to accurately project a disaggregated assessment of market and affordable housing into the next five years in order to determine whether there was a sufficient housing land supply to accord with the requirements of the NPPF.

It is complex enough as it is for local planning authorities, applicants and, on appeal, inspectors, to establish with any degree of accuracy whether a five year housing land supply exists. This will be made significantly more complicated under the disaggregated approach. Indeed, it would be necessary to estimate not only whether a site which does not as yet have planning permission will come forward, but also the split between market and affordable housing, whether there are any viability constraints which may lead to a reductions in the proportion of affordable housing, and how the development will be phased to deliver the estimated mix of housing tenures. Any calculation based on such a number of uncertain variables is fraught with difficulty and subject to huge uncertainty.

Notwithstanding the objections we have to both the overall housing requirement and the principle of the 'disaggregated approach', we do not consider this to be a practical approach to assessing a fundamental component of the NPPF.

### Change to the policy requested:

The disaggregated approach should be replaced with a fixed housing requirement and the calculation of the five year housing land supply should be based upon the fixed requirement.

## Change Reference: BT1 Alternative Site Options - Odd Down Option 1

**Respondent Number:** 5023 **Comment Number:** 1 **Respondent Name:** Helen Acosta

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** BT1 Alternative Site Options - Odd Down Option 1

**Location:**

### Comment made on the Proposed Change:

**Support:**

Green Belt land should not be developed. Alternative brownfield sites should be considered, to avoid loss of Green Belt.

As part of the Cotswolds, this is an area of outstanding natural beauty and irreplaceable once lost.

Developing Green Belt land is inconsistent with Section 9 of the National Planning Policy Framework (NPPF).

To develop on the Green Belt is to allow urban sprawl to encroach on the surrounding countryside, which Green Belt status is supposed to prevent.

Development of this are would promote car-dependency and traffic increase.

The proposed area for development is home to skylarks and other wildlife.

### Change to the policy requested:

Abandon the plan to develop this Green Belt land and explore alternative brownfield sites for development.

## Change Reference: BT2 Alternative Site Options - Odd Down Option 2

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 5023 **Comment** 2 **Respondent** Helen Acosta  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** BT2 Alternative Site Options - Odd Down Option 2**Location:****Comment made on the Proposed Change:**Support: 

Green Belt land should not be developed. Alternative brownfield sites should be considered, to avoid loss of Green Belt.

As part of the Cotswolds, this is an area of outstanding natural beauty and irreplaceable once lost.

Developing Green Belt land is inconsistent with Section 9 of the National Planning Policy Framework (NPPF).

To develop on the Green Belt is to allow urban sprawl to encroach on the surrounding countryside, which Green Belt status is supposed to prevent.

Development of this area would promote car-dependency and traffic increase.

The proposed area for development is home to skylarks and other wildlife.

**Change to the policy requested:**

Abandon the plan to develop this Green Belt land and explore alternative brownfield sites for development.

**Change Reference: KM1 Alternative Site Options - East Keynsham (north of railway)****Respondent** 837 **Comment** 1 **Respondent** David Redgewell  
**Number:** **Number:** **Name:****Respondent** South West Transport  
**Organisation:** Network Railfuture**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** KM1 Alternative Site Options - East Keynsham (north of railway)**Location:****Comment made on the Proposed Change:**Support: 

More housing needs to be associated on the transport corridor with bus links 338 349 to Bristol Bus Station and Bristol Temple Meads and a new station improvement as part of the Frys site Somerdale and create the Bristol Metro.

**Change to the policy requested:**

With improved 20 minutes frequencies bus services could be improved between Keynsham station, Town centre, Charlton Road and Whitechurch housing estate proposal and Whitechurch village, Whitechurch station. The site could include more houses to meet the 4500 on the BANES housing waiting list.

**Respondent** 837 **Comment** 14 **Respondent** David Redgewell  
**Number:** **Number:** **Name:****Respondent** South West Transport  
**Organisation:** Network Railfuture**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** KM1 Alternative Site Options - East Keynsham (north of railway)**Location:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Comment made on the Proposed Change:**Support: 

KM1 remove the green belt allocation.

We would like to see this housing site allocated to deal with the need for meeting the housing waiting list in Bath and Keynsham for affordable and rented housing. With use of the A4 corridor / rail corridor stations in Keynsham and Saltford, new bus services, plus new services X39, 338, 339 A4 around the new housing estate with bus link to Bristol and Bath and extra industry estate / business units around Broadmead. This is very, very suitable location with the NP framework supporting housing land allocation.

**Change to the policy requested:**
**Respondent Number:** 837 **Comment Number:** 3 **Respondent Name:** David Redgewell

**Respondent Organisation:** South West Transport Network Railfuture
**Agent ID:** **Agent Name:**
**Further Information available in the original comment?**  **Attachments sent with the comment?** 
**Change Reference:** KM1 Alternative Site Options - East Keynsham (north of railway)**Location:****Comment made on the Proposed Change:**Support: 

KM1 remove the green belt allocation.

**Change to the policy requested:**

We would like to see this housing site allocated to deal with the need for meeting the housing waiting list in Bath and Keynsham for affordable and rented housing. With use of the A4 corridor / rail corridor stations in Keynsham and Saltford, new bus services, plus new services X39, 338, 339 A4 around the new housing estate with bus link to Bristol and Bath and extra industry estate / business units around Broadmead. This is very, very suitable location with the NP framework supporting housing land allocation.

**Respondent Number:** 3494 **Comment Number:** 4 **Respondent Name:** Andrew Wait

**Respondent Organisation:**
**Agent ID:** **Agent Name:**
**Further Information available in the original comment?**  **Attachments sent with the comment?** 
**Change Reference:** KM1 Alternative Site Options - East Keynsham (north of railway)**Location:****Comment made on the Proposed Change:**Support: 

I would prefer to see development in the KM1 area as this area potentially would have better transport links and would not add to the continued urban sprawl which is the Chandag Estate. That area could be a more sustainable green area utilising the benefits of being close to the river.

**Change to the policy requested:**

I support implementing Alternative Option KM1 and removing the pink area in CSA 35/36 as this makes for better sustainable development.

**Change Reference:** KM3 Alternative Site Options - SW Keynsham (including Leys Farm)

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

**Respondent Number:** 93    **Comment Number:** 7    **Respondent Name:** Highways Agency    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** KM3 Alternative Site Options - SW Keynsham (including Leys Farm)

**Location:** Comment on Alternative Options

**Comment made on the Proposed Change:**

**Support:**

Alternative Option KM3: The 50 dwellings at Lay's Farm would appear to be better connected to the rest of Keynsham in terms of proximity to existing bus services and distances by non-car modes to facilities. Therefore on that basis an option which includes this site is marginally preferable to an option which excludes it. However, as has been said before, the Agency has concerns over the distance of the triangle of land between Parkhouse Lane and Charlton Road from facilities and the rest of Keynsham Options which do not include that land parcel would be preferable;

**Change to the policy requested:**

**Respondent Number:** 275    **Comment Number:** 11    **Respondent Name:** Redrow Homes South West    **Respondent Organisation:**

**Agent ID:** 164    **Agent Name:** DLP Planning Consultants

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** KM3 Alternative Site Options - SW Keynsham (including Leys Farm)

**Location:** Land adjoining South West Keynsham

**Comment made on the Proposed Change:**

**Support:**

The extent of the 'alternative option' identified on the plan at Annex 3 at Lays Farm, and identified with a potential capacity of 50 dwellings is based on wholly erroneous information as to the nature and position of a gas main shown on the (unnumbered) plan attached to the SHLAA and referred to by Arup in its review of Green Belt. This does not accord with the records held by Wales and West Utilities Ltd who own and operate the pipeline. The actual route of the pipeline runs some 100 metres further to the west (Ref: W&WU Pipeline Plan and letter from W&WU dated 12.06.2013 and attached at Appendix A to the Landscape and Visual Appraisal).

The impact of the existing pipeline on the development potential of the site is consequently minimal and certainly not such that would warrant disregarding it completely as a sustainable option. Moreover, it is feasible to divert the main, and Redrow have recently done just that elsewhere in Bristol, and by using modern materials it would further reduce any no-build easement to 6m.

This inaccurate information appears to have been the principal reason for Arup dismissing the land at Lays Farm as a serious option for release from the Green Belt, without properly assessing the scope for development here having regard to the purposes of Green Belt and in particular: preventing neighbouring towns merging into one another (i.e. Keynsham and Bristol); and preserving the setting and special character of historic towns (in this case, the Queen Charlton Conservation Area).

The site, south of Lays Farm (Ref: Area 10 BANES Sustainability Appraisal Report Annex L) is bound on two side by development and forms a far more logical addition to the built-up area of Keynsham than that proposed to be released from the Green Belt to the south (Ref: Area 13 BANES Sustainability Appraisal Report Annex L).

The Site is located adjacent to Charlton Road as it enters Keynsham from the south. It occupies an area of approximately 7.8 ha and is currently given over to pasture. Its northern and eastern boundaries are formed by built form, with its southern and western boundaries being rural in nature.

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

There is currently no public access onto the Site, although a well-used footpath runs along its southern boundary. There are no significant landscape features on the Site, other than the hedgerows which form the field boundaries.

The Site sits at an elevation of 72.5m AOD to 59.5m AOD, and is broadly flat in nature, sloping slightly downwards to its eastern boundary with Charlton Road.

The Site's landscape and visual relationship with its surroundings is primarily with the landscape of the Charlton Valley and Stockwood to the west.

The Site sits within the LCA5 'Dundry Plateau' of the Rural Landscape of Bath and North East Somerset, a rural Landscape Character Assessment and has an 'open' character, typical of this area.

The visual appraisal (attached) showed that the Site is partially visible from several locations to the west, but generally within the context of existing built form.

BANES has, through its consultants, Arups, reviewed the Green Belt gap between Keynsham and Stockwood and identified and noted the easternmost field on the Lays Farm Site as potentially suitable for development. This area is outlined as part of Alternative Option KM3 in Annex 3 of the Schedule of Core Strategy Amendments - November 2013.

Arups' West Keynsham Development Concept Options Report (March 2013), should be reviewed, as it placed an existing high pressure gas main inaccurately on the Lays Farm Site, and also incorrectly presumed an overly wide easement zone associated with it. The incorrect location of this main heavily influenced Arups' 'Developable Area' which has fed through into the Schedule of Core Strategy Amendments.

In light of these inaccuracies the Site was revisited and the reappraised with particular consideration being given to: (1) Potential visual impact across the Charlton Valley; and (2) The setting of Queen Charlton (Conservation Area).

The landscape development strategy for the Site (see attached) has evolved out of the findings of the landscape and visual appraisal and the now correctly located, high pressure gas main. The proposal is to introduce development into the north-eastern part of the Site, set back from the western boundary and to introduce a significant strip of structure planting that is complementary to that which is found in the locality.

The introduction of a robust, defensible edge would ensure that in the long term the setting of Queen Charlton and the character of the Charlton Valley are not adversely affected by the introduction of development. Similarly the 'rounding off' of development in this south-eastern corner of the town, and the inclusion of the woodland strip would ensure that the separate identities of Keynsham and Queen Charlton are preserved as well as ensuring that there would not be a future coalescence with Stockwood to the west.

As such we do not believe development on the Site would compromise the purposes of the Green Belt (Ref: NPPF Para 80) with particular reference to preventing Keynsham merging with Bristol and preserving the historic setting and special character of Queen Charlton.

As a consequence of the above, the Site should be considered for inclusion within the land to be removed from the Green Belt and allocated for up to 150 dwellings.

### Change to the policy requested:

Amend notation on Proposals Map to indicate release of land at Lays Farm, west of Keynsham (See attached Plan) with the potential to deliver up to 150 dwellings.

## Change Reference: WH1 Alternative Site Options - Whitchurch (Horseworld)

Respondent Number: 0      Comment Number: 6      Respondent Name: Multiple

Respondent Organisation:

Agent ID:      Agent Name:

Further Information available in the original comment?       Attachments sent with the comment?

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)**Location:** Comment on Alternative Options**Comment made on the Proposed Change:**Support: 

WH1 We strongly object to this site being on the Alternative Strategic Site. There must be no removal of this land from Green Belt. Bath & North East Somerset Council has already rejected a Planning Application for 300 houses at this site on the grounds of Green Belt, traffic etc so why would this same council now recommend this? WH1 is what stops Whitchurch Village merging with Stockwood and stops urban sprawl. A37 is congested, primary school is full, no post office. This would produce unsustainable development and Bristol City Council do not want it.

**Change to the policy requested:**

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 3 to this schedule.]

**Respondent Number:** 0      **Comment Number:** 18      **Respondent Name:** Multiple

**Respondent Organisation:**

**Agent ID:**      **Agent Name:**

**Further Information available in the original comment?**       **Attachments sent with the comment?**

**Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)**Location:** Comment on Alternative Options**Comment made on the Proposed Change:**Support: 

WH1 This area should not be on the Alternative Strategic Site List. This Green Belt land is the very thing that stops Whitchurch Village from merging with Stockwood forming one big urban sprawl. B&NES has already refused planning for 300 houses at this site so again it seems ludicrous for the Council to now consider releasing this land from GB. Bristol CC have objected to any such development- please see first paragraph above. Infrastructure inadequate- A37 already congested, no Post Office, no NHS Dentist, primary school oversubscribed, no local employment.

**Change to the policy requested:**

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 5 to this schedule.]

**Respondent Number:** 0      **Comment Number:** 12      **Respondent Name:** Multiple

**Respondent Organisation:**

**Agent ID:**      **Agent Name:**

**Further Information available in the original comment?**       **Attachments sent with the comment?**

**Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)**Location:** Comment on Alternative Options**Comment made on the Proposed Change:**Support: 

WH1 We strongly object to this site being on the Alternative Strategic Site. There must be no removal of this land from Green Belt. Bath & North East Somerset Council has already rejected a Planning Application for 300 houses at this site on the grounds of Green Belt, traffic etc so why would this same council now recommend this?

**Change to the policy requested:**

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 4 to this schedule.]

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent** 86 **Comment** 7 **Respondent**  
**Number:** **Number:** **Name:****Respondent** Whitchurch Parish  
**Organisation:** Council**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)**Location:****Comment made on the Proposed Change:****Support:** 

Is not a suitable alternative site for removal of land from the Green Belt. If this land was removed from the Green Belt Whitchurch Village would be merged with Stockwood and would lose its identity completely. B&NES Council have already objected to using this land for a development of 200 dwellings, which then went to a Planning Inquiry and is at present being considered by the Secretary of State.

Bristol City Council, who have a ratified Core Strategy, do not want any building on their boundaries as the increase in traffic and problems associated with this will be passed on to them.

**Change to the policy requested:****Respondent** 93 **Comment** 8 **Respondent** Highways Agency  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)**Location:** Comment on Alternative Options**Comment made on the Proposed Change:****Support:** 

Alternative Option WH1: Parts of this site are close to frequent bus services serving Stockwood and the site as whole appears to have the potential to be well-connected to the existing built-up area. Notwithstanding the fact that achieving a sustainable transport solution on this site would require significant support from the neighbouring local planning authority, the Agency considers this site could have better non-car accessibility than the preferred option east of Sleep Lane.

**Change to the policy requested:****Respondent** 170 **Comment** 13 **Respondent** Robert Hitchins Ltd  
**Number:** **Number:** **Name:****Respondent**  
**Organisation:****Agent ID:** 19 **Agent Name:** Pegasus Planning Group**Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)**Location:****Comment made on the Proposed Change:****Support:** 

Land at WH1 should be allocated in Policy RA 5 in the Schedule of Amendments; this site has been demonstrated during the preparation of the planning application and at evidence at the recent inquiry to be the most appropriate location in this location to be removed from the Green Belt. The site is sustainable and can meet the housing land supply shortfall as

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

it is available and deliverable.

**Change to the policy requested:**

Land at WH1 should be included in Policy RA 5 as a site which is to be removed from the Green Belt in this plan period to meet development needs.

**Respondent Number:** 428 **Comment Number:** 3 **Respondent Name:** Susan Wilkes**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)**Location:****Comment made on the Proposed Change:****Support:** 

WH1 We strongly object to this site being on the Alternative Strategic Site. There must be no removal of this land from Green Belt. Bath & North East Somerset Council has already rejected a planning application for 300 houses at this site on the grounds of Green Belt, traffic etc so why would this same council now recommend this? WH1 is what stops Whitchurch Village merging with Stockwood and stops urban sprawl. A37 is congested, primary school is full, no post office. This would produce unsustainable development and Bristol City Council do not want it.

**Change to the policy requested:****Respondent Number:** 604 **Comment Number:** 2 **Respondent Name:** Mr Raymond Stone**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)**Location:** Land adjoining Whitchurch**Comment made on the Proposed Change:****Support:** 

WH1 Site is not suitable for removal from green belt. Once again urban sprawl lost in the City of Bristol.

**Change to the policy requested:****Respondent Number:** 810 **Comment Number:** 3 **Respondent Name:** PN & J Britten**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)**Location:** Land adjoining Whitchurch**Comment made on the Proposed Change:****Support:** 

WH1 This area should not be on the Alternative Strategic Site List. This Green Belt land is the very thing that stops Whitchurch Village from merging with Stockwood forming one big urban sprawl. B&NES has already refused planning for

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

300 houses at this site so again it seems ludicrous for the Council to now consider releasing this land from GB. Bristol CC have objected to any such development – please see first paragraph above. Infrastructure inadequate – A37 already congested, no Post Office, no NHS Dentist, primary school oversubscribed, no local employment .

**Change to the policy requested:**

**Respondent Number:** 811 **Comment Number:** 2 **Respondent Name:** Mary Walsh, Jill Britten

**Respondent Organisation:** WHITCHURCH VILLAGE ACTION GROUP

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

WH1 We do not agree with this land being on the Alternative Strategic Site List. This Green Belt land should not be considered as an alternative strategic site. It is the very thing that stops Whitchurch Village being joined to Stockwood and thereby losing its very identity and sense of community. Again this Council has refused a planning application on this land for reason of traffic, sustainability, green belt etc. so again it makes no logic for the same Council to be proposing this Site. Infrastructure cannot cope. A37 already congested, no Post Office, no NHS Dentist, Primary School over subscribed, very limited local employment. Bristol City Council have objected unanimously to this site being developed for reasons of Infrastructure and sustainability as BCC knows that such development will increase their problems – see paragraph below.

**Change to the policy requested:**

**Respondent Number:** 4604 **Comment Number:** 4 **Respondent Name:**

**Respondent Organisation:** Barratt Homes Bristol

**Agent ID:** 176 **Agent Name:** Nathaniel Lichfield & Partners

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

Barratt Homes supports the decision to not include site WH1 at Orchard Park as part of the greenbelt release for Whitchurch.

The Orchard Park site (Cell F in the Arup Green Belt Review report) clearly stated the role that this parcel had in meeting the purposes of the green belt. It said that Land Cell F is contiguous to the urban area of Bristol and that development in this land cell could contribute to Bristol enveloping the village of Whitchurch resulting in sprawl.

The development of alternative site WH1 would have a permanent detrimental effect on the purpose of the greenbelt in preventing urban sprawl between Whitchurch and Bristol.

**Change to the policy requested:**

There should be no change. Site WH1 should not be released from the green belt.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Respondent Number:** 4926 **Comment Number:** 2 **Respondent Name:** Cllr Peter Edwards**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)**Location:****Comment made on the Proposed Change:**Support: 

Is not a suitable alternative site for removal of land from the Green Belt. If this land was removed from the Green Belt Whitchurch Village would be merged with Stockwood and would lose its identity completely . B&NES Council have already objected to using this land for a development of 200 dwellings, which then went to a Planning Inquiry and is at present being considered by the Secretary of State .

Bristol City Council, who have a ratified Core Strategy, do not want any building on their boundaries as the increase in traffic and problems associated with this will be passed on to them.

**Change to the policy requested:****Respondent Number:** 4988 **Comment Number:** 1 **Respondent Name:** Darrell Williams**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** WH1 Alternative Site Options - Whitchurch (Horseworld)**Location:****Comment made on the Proposed Change:**Support: 

WH1 would only ADD to the already heavy traffic problem in A37 & spoil views from Whitchurch village towards Dundry Hill.

**Change to the policy requested:****Change Reference: WH2 Alternative Site Options - Whitchurch (Orchard Park)****Respondent Number:** 0 **Comment Number:** 19 **Respondent Name:** Multiple**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** WH2 Alternative Site Options - Whitchurch (Orchard Park)**Location:** Comment on Alternative Options**Comment made on the Proposed Change:**Support: 

WH2 The Green Belt land should not be on the Alternative Strategic Site List. The A37 already at capacity and is unsuitable for all the reasons mentioned above.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change to the policy requested:**

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 5 to this schedule.]

**Respondent Number:** 0

**Comment Number:** 13

**Respondent Name:** Multiple

**Respondent Organisation:**

**Agent ID:**      **Agent Name:**

**Further Information available in the original comment?**       **Attachments sent with the comment?**

**Change Reference:** WH2 Alternative Site Options - Whitchurch (Orchard Park)

**Location:** Comment on Alternative Options

**Comment made on the Proposed Change:**

**Support:**

WH2 We also strongly object to removal of this land from Green Belt and therefore do not want it put on the Alternative Strategic Site. This land is not only used for agriculture but is the site of the tremendously popular Whitchurch Village Fete.

**Change to the policy requested:**

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 4 to this schedule.]

**Respondent Number:** 0

**Comment Number:** 7

**Respondent Name:** Multiple

**Respondent Organisation:**

**Agent ID:**      **Agent Name:**

**Further Information available in the original comment?**       **Attachments sent with the comment?**

**Change Reference:** WH2 Alternative Site Options - Whitchurch (Orchard Park)

**Location:** Comment on Alternative Options

**Comment made on the Proposed Change:**

**Support:**

WH2 We also strongly object to removal of this land from Green Belt and therefore do not want it put on the Alternative Strategic Site. This land is not only used for agriculture but is the site of the tremendously popular Whitchurch Village Fete. A37 already congested and Bristol City Council do not want this development.

**Change to the policy requested:**

[This comment was submitted by a significant number of individuals – these individuals are listed in Appendix 3 to this schedule.]

**Respondent Number:** 86

**Comment Number:** 8

**Respondent Name:**

**Respondent Organisation:** Whitchurch Parish Council

**Agent ID:**      **Agent Name:**

**Further Information available in the original comment?**       **Attachments sent with the comment?**

**Change Reference:** WH2 Alternative Site Options - Whitchurch (Orchard Park)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

This is not land at HorseWorld but is privately owned agricultural land which also includes the field used for the annual Whitchurch Village Fete, now entering its 38th year.

This land is unsuitable for removal from the Green Belt. Any development in this area would add to the congestion on the

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

A37 in Whitchurch Village.

**Change to the policy requested:**

**Respondent Number:** 93    **Comment Number:** 9    **Respondent Name:** Highways Agency    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** WH2 Alternative Site Options - Whitchurch (Orchard Park)

**Location:** Comment on Alternative Options

**Comment made on the Proposed Change:**

**Support:**

Alternative Option WH2 : This site is adjacent to the A37 and consequently is close to the bus services on the A37. The Agency considers this site may have better non-car accessibility than the preferred option east of Sleep Lane.

**Change to the policy requested:**

**Respondent Number:** 428    **Comment Number:** 2    **Respondent Name:** Susan Wilkes    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** WH2 Alternative Site Options - Whitchurch (Orchard Park)

**Location:**

**Comment made on the Proposed Change:**

**Support:**

WH2 We also strongly object to removal of this land from Green Belt and therefore do not want it put on the Alternative Strategic Site. This land is not only used for agriculture but is the site of tremendously popular Whitchurch Village Fete. A37 already congested and Bristol City Council do not want this development. Also Stanton Lane is a bottleneck day and night. Difficult to get out of drive. It will only make it worse.

**Change to the policy requested:**

**Respondent Number:** 604    **Comment Number:** 3    **Respondent Name:** Mr Raymond Stone    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** WH2 Alternative Site Options - Whitchurch (Orchard Park)

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

WH2 Unsuitable for removal from green belt. Development here would cause awful congestion on the A37 through the village.

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

Change to the policy requested:

**Respondent Number:** 810

**Comment Number:** 4

**Respondent Name:** PN & J Britten

**Respondent Organisation:**

**Agent ID:**      **Agent Name:**

**Further Information available in the original comment?**       **Attachments sent with the comment?**

**Change Reference:** WH2 Alternative Site Options - Whitchurch (Orchard Park)

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

WH2 The Green Belt land should not be on the Alternative Strategic Site List. The A37 already at capacity and is unsuitable for all the reasons mentioned above.

Change to the policy requested:

**Respondent Number:** 811

**Comment Number:** 3

**Respondent Name:** Mary Walsh, Jill Britten

**Respondent Organisation:** WHITCHURCH VILLAGE ACTION GROUP

**Agent ID:**      **Agent Name:**

**Further Information available in the original comment?**       **Attachments sent with the comment?**

**Change Reference:** WH2 Alternative Site Options - Whitchurch (Orchard Park)

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

WH2 This Green Belt land should not be considered as an alternative strategic site. The A 37 is already congested. Further, we wish it to be removed from the Alternative Strategic Site considerations. It is unsuitable for all the same reasons listed above and below.

Change to the policy requested:

**Respondent Number:** 4604

**Comment Number:** 1

**Respondent Name:**

**Respondent Organisation:** Barratt Homes Bristol

**Agent ID:** 176      **Agent Name:** Nathaniel Lichfield & Partners

**Further Information available in the original comment?**       **Attachments sent with the comment?**

**Change Reference:** WH2 Alternative Site Options - Whitchurch (Orchard Park)

**Location:** Land adjoining Whitchurch

**Comment made on the Proposed Change:**

**Support:**

Barratt Homes supports the decision to not include site WH2 as part of the greenbelt release for Whitchurch.

The site does not form a logical extension to the village with only a couple of buildings across the entire site at the moment. The site is low lying and has open views from short and long distances. The land includes playing fields that should not be lost as a facility to the village.

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The development of alternative site WH2 would have a permanent detrimental effect on the purpose of the greenbelt in seeking to keep land permanently open.

### Change to the policy requested:

There should be no change. Site WH1 should not be released from the green belt.

**Respondent Number:** 4604 **Comment Number:** 5 **Respondent Name:** **Respondent Organisation:** Barratt Homes Bristol

**Agent ID:** 176 **Agent Name:** Nathaniel Lichfield & Partners

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** WH2 Alternative Site Options - Whitchurch (Orchard Park)

**Location:** Land adjoining Whitchurch

### Comment made on the Proposed Change:

Support:

The Alternative Strategic Site Allocations that were considered - listed in Annex 3 - is erroneously named. Change ref: WH2 states Land at Whitchurch, Horseworld.

Indeed, the Horseworld site is included as part of a wider strategic allocation proposed elsewhere in the Amendment document. The site with reference WH2 shown on the map is not for Horseworld. In order to avoid uncertainty, this mistake should be corrected.

### Change to the policy requested:

The name attached to alternative site WH2 should be changed for the purpose of clarity.

**Respondent Number:** 4926 **Comment Number:** 1 **Respondent Name:** Cllr Peter Edwards **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** WH2 Alternative Site Options - Whitchurch (Orchard Park)

**Location:**

### Comment made on the Proposed Change:

Support:

This is not land at HorseWorld but is privately owned agricultural land which also includes the field used for the annual Whitchurch Village Fete. This land is unsuitable for removal from the Green Belt. Any development in this area would add to the congestion on the A37 in Whitchurch Village.

### Change to the policy requested:

## Change Reference: Consultation Process

**Respondent Number:** 93 **Comment Number:** 1 **Respondent Name:** Highways Agency **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** Consultation Process

**Location:**

Comment made on the Proposed Change:

Support:

Thank you for providing the Highways Agency with the opportunity to comment on the proposed amendments to the Core Strategy, issued in November 2013. We appreciate that the consultation does not relate to the principle of releasing green belt land in five places but instead to the boundaries proposed, the placemaking principles which will guide how they are developed, and the consequential text changes which are required throughout the Core Strategy.

The Agency responded at the time of the previous consultation in its letter dated 30 April 2013. This emphasised, inter alia, that the proposed strategic developments might lead to additional journeys on the Strategic Road Network (M4, A36 and A46 locally) and will require appropriate transport infrastructure to ensure impacts are mitigated and non-car travel maximised. The Agency considers that these requirements can be set out in both the Core Strategy placemaking principles (see our comments below) and in the Placemaking Plan development management policies (when adopted).

The comments in this letter reflect guidance contained in:

- the Department for Transport (OfT) & Department for Communities & Local Government (DCLG) publication entitled Guidance on Transport Assessment (dated March 2007);
- DfT Circular 02/2013 entitled The Strategic Road Network and the Delivery of Sustainable Development, dated 10 September 2013; and
- the National Planning Policy Framework (NPPF), published by DCLG in March 2012.

The DfT Circular states that inter alia the through the production of Local Plans, development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives. It is particularly with this in mind that we have framed our response.

Change to the policy requested:

**Respondent Number:** 180    **Comment Number:** 1    **Respondent Name:**    **Respondent Organisation:** J S Bloor Ltd

**Agent ID:** 19    **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** Consultation Process

**Location:**

Comment made on the Proposed Change:

Support:

The Council's Guidance Note for completing the Comment Form states 'We are only accepting comments that relate to the amendments or rejected site allocations identified in the Schedule of Core Strategy Amendments.' This statement is not clear. To comment on the amendments it must be possible to comment on the absence of an amendment. The purpose of the amendments is to respond to concerns expressed by the Inspector and it must therefore be possible to comment on matters that address the questions about whether the Council has responded adequately to those concerns. Comments are ultimately addressed to the Inspector and it is not for the Council to accept or reject comments at this stage.

A fundamental problem with this consultation on Core Strategy Amendments is that it is being conducted in advance of completing the examination of the SHMA's assessment of future housing requirements, which are to be heard on 10th and 11th December. The justification for Green Belt releases relies on the scale of housing requirements in the District (and the local needs of specific settlements) to weigh against the importance of maintaining the existing boundaries of settlements and Green Belt. Without agreement on the scale of housing requirements, it is not possible to resolve the balance to be struck between those requirements and the claims of maintaining areas of Green Belt.

In its note BNES/51 on Background to the Proposed Amendments, the Council stated that its full explanation of amendments to Policy DW1 would be set out in its response to ID/42 by 22 November – after the start of the consultation on 11 November. This document (BNES/52) is far from easy to follow; it omits important information about the revised SHMA approach to housing requirements; it does not provide adequate referencing of sources; and it contains several

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obvious errors.

There were difficulties with the previous consultation on Proposed Changes (commented on in ID/32) when not all relevant information was made available at the start of the consultation period. In ID/40 the Inspector advised the Council to give itself time to put forward its changes thoroughly and with careful explanation of its reasons. Further explanation is still required of the approach to housing requirements described in BNES/52 and this limits the effectiveness of consultation on the Schedule of Core Strategy Amendments

**Change to the policy requested:**

**Respondent Number:** 216    **Comment Number:** 1    **Respondent Name:** Mr & Mrs Hawkes    **Respondent Organisation:** Crest Homes (SW)

**Agent ID:** 174    **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**     **Attachments sent with the comment?**

**Change Reference:** Consultation Process

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The Council’s Guidance Note for completing the Comment Form states ‘We are only accepting comments that relate to the amendments or rejected site allocations identified in the Schedule of Core Strategy Amendments.’ This statement is not clear. To comment on the amendments it must be possible to comment on the absence of an amendment. The purpose of the amendments is to respond to concerns expressed by the Inspector and it must therefore be possible to comment on matters that address the questions about whether the Council has responded adequately to those concerns. Comments are ultimately addressed to the Inspector and it is not for the Council to accept or reject comments at this stage.

A fundamental problem with this consultation on Core Strategy Amendments is that it is being conducted in advance of completing the examination of the SHMA’s assessment of future housing requirements, which are to be heard on 10th and 11th December. The justification for Green Belt releases relies on the scale of housing requirements in the District (and the local needs of specific settlements) to weigh against the importance of maintaining the existing boundaries of settlements and Green Belt. Without agreement on the scale of housing requirements, it is not possible to resolve the balance to be struck between those requirements and the claims of maintaining areas of Green Belt.

In its note BNES/51 on Background to the Proposed Amendments, the Council stated that its full explanation of amendments to Policy DW1 would be set out in its response to ID/42 by 22 November – after the start of the consultation on 11 November. This document (BNES/52) is far from easy to follow; it omits important information about the revised SHMA approach to housing requirements; it does not provide adequate referencing of sources; and it contains several obvious errors.

There were difficulties with the previous consultation on Proposed Changes (commented on in ID/32) when not all relevant information was made available at the start of the consultation period. In ID/40 the Inspector advised the Council to give itself time to put forward its changes thoroughly and with careful explanation of its reasons. Further explanation is still required of the approach to housing requirements described in BNES/52 and this limits the effectiveness of consultation on the Schedule of Core Strategy Amendments

**Change to the policy requested:**

As this consultation is being undertaken on the basis of figures for housing requirements that are still being examined, it is also necessary to comment on the absence of amendments and the omission of sites that would contribute to a higher and more appropriate housing target.

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**Respondent Number:** 219 **Comment Number:** 1 **Respondent Name:** Edward Ware Homes Limited **Respondent Organisation:**

**Agent ID:** 165 **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** Consultation Process

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The Council's Guidance Note for completing the Comment Form states 'We are only accepting comments that relate to the amendments or rejected site allocations identified in the Schedule of Core Strategy Amendments.' This statement is not clear. To comment on the amendments it must be possible to comment on the absence of an amendment. The purpose of the amendments is to respond to concerns expressed by the Inspector and it must therefore be possible to comment on matters that address the questions about whether the Council has responded adequately to those concerns. Comments are ultimately addressed to the Inspector and it is not for the Council to accept or reject comments at this stage.

A fundamental problem with this consultation on Core Strategy Amendments is that it is being conducted in advance of completing the examination of the SHMA's assessment of future housing requirements, which are to be heard on 10th and 11th December. The justification for Green Belt releases relies on the scale of housing requirements in the District (and the local needs of specific settlements) to weigh against the importance of maintaining the existing boundaries of settlements and Green Belt. Without agreement on the scale of housing requirements, it is not possible to resolve the balance to be struck between those requirements and the claims of maintaining areas of Green Belt.

In its note BNES/51 on Background to the Proposed Amendments, the Council stated that its full explanation of amendments to Policy DW1 would be set out in its response to ID/42 by 22 November – after the start of the consultation on 11 November. This document (BNES/52) is far from easy to follow; it omits important information about the revised SHMA approach to housing requirements; it does not provide adequate referencing of sources; and it contains several obvious errors.

There were difficulties with the previous consultation on Proposed Changes (commented on in ID/32) when not all relevant information was made available at the start of the consultation period. In ID/40 the Inspector advised the Council to give itself time to put forward its changes thoroughly and with careful explanation of its reasons. Further explanation is still required of the approach to housing requirements described in BNES/52 and this limits the effectiveness of consultation on the Schedule of Core Strategy Amendments

**Change to the policy requested:**

As this consultation is being undertaken on the basis of figures for housing requirements that are still being examined, it is also necessary to comment on the absence of amendments and the omission of sites that would contribute to a higher and more appropriate housing target.

**Respondent Number:** 269 **Comment Number:** 1 **Respondent Name:** **Respondent Organisation:** Barratt Homes Ltd

**Agent ID:** 174 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** Consultation Process

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The Council's Guidance Note for completing the Comment Form states 'We are only accepting comments that relate to the amendments or rejected site allocations identified in the Schedule of Core Strategy Amendments.' This statement is not clear. To comment on the amendments it must be possible to comment on the absence of an amendment. The

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

purpose of the amendments is to respond to concerns expressed by the Inspector and it must therefore be possible to comment on matters that address the questions about whether the Council has responded adequately to those concerns. Comments are ultimately addressed to the Inspector and it is not for the Council to accept or reject comments at this stage.

A fundamental problem with this consultation on Core Strategy Amendments is that it is being conducted in advance of completing the examination of the SHMA's assessment of future housing requirements, which are to be heard on 10th and 11th December. The justification for Green Belt releases relies on the scale of housing requirements in the District (and the local needs of specific settlements) to weigh against the importance of maintaining the existing boundaries of settlements and Green Belt. Without agreement on the scale of housing requirements, it is not possible to resolve the balance to be struck between those requirements and the claims of maintaining areas of Green Belt.

In its note BNES/51 on Background to the Proposed Amendments, the Council stated that its full explanation of amendments to Policy DW1 would be set out in its response to ID/42 by 22 November – after the start of the consultation on 11 November. This document (BNES/52) is far from easy to follow; it omits important information about the revised SHMA approach to housing requirements; it does not provide adequate referencing of sources; and it contains several obvious errors.

There were difficulties with the previous consultation on Proposed Changes (commented on in ID/32) when not all relevant information was made available at the start of the consultation period. In ID/40 the Inspector advised the Council to give itself time to put forward its changes thoroughly and with careful explanation of its reasons. Further explanation is still required of the approach to housing requirements described in BNES/52 and this limits the effectiveness of consultation on the Schedule of Core Strategy Amendments

### Change to the policy requested:

As this consultation is being undertaken on the basis of figures for housing requirements that are still being examined, it is also necessary to comment on the absence of amendments and the omission of sites that would contribute to a higher and more appropriate housing target.

**Respondent Number:** 4641 **Comment Number:** 2 **Respondent Name:** David Vernalls

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** Consultation Process

**Location:** Land adjoining Weston (General)

### Comment made on the Proposed Change:

**Support:**

Firstly, in terms of consultation and public involvement, this latest change rides roughshod over previous promises given to the community in Weston. We were told back in May 2013 at a public meeting that the council understood that its previous proposals and consultation were rushed, and that in terms of specific site selection, as a safeguard, this would take place as part of a comprehensive "Placemaking" process. The clear impression given was that the local community would be given an opportunity to influence the shape and scope of its locality. This most recent change has dispensed with that, and its clear that planners have started with a need for 300 homes, and have had to use what land was remaining as sites were deemed unsuitable in order to get as far as possible towards that total. This is in part rooted in the rushed presentation back in March, when broad swathes of land were included as development sites without proper evaluation. We now have a situation where Weston clearly cannot deliver the housing envisaged, but because of the ongoing rushed nature of this "Strategy" rather than looking in broader terms whether removing Weston altogether is advisable, the proposals have simply been pruned down to fit the remaining available land. This is not strategic thinking – its problem solving on the hoof, and the community of Weston deserves better. The lack of clear thought in these proposals is demonstrated in some of the practical problems which exist in terms of using these remaining sites. To be fair to the council, this whole process is based on a flawed assumption that massive numbers of houses can be built and sold when such a large scale programme is likely to (and indeed intended to) depress house prices. The reality is that if you set out to build enough house prices to drive prices down, no-one will buy a depreciating asset, which means no-one will build something that won't sell. A more sensible steadier programme of building which allows prices to remain static is more

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likely to yield the desired result of long term affordability in real terms.

**Change to the policy requested:**

**Respondent Number:** 4643 **Comment Number:** 2 **Respondent Name:** Joanna Campbell

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** Consultation Process

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

**Support:**

I would like to add how difficult it is to navigate through this process, and even now I'm not sure whether I have done it correctly. For the average layman, it is well nigh impossible, thus reducing the number of people who are able to comment, hardly democratic!

PPS We had been told that the council would take a year to consider the options. To follow that there would be a placemaking plan in which the public could participate. Instead, we were given barely 6 weeks to respond, and this at a very busy time of year. Not helpful!

**Change to the policy requested:**

**Respondent Number:** 4788 **Comment Number:** 1 **Respondent Name:** Stratland LLP

**Respondent Organisation:**

**Agent ID:** 182 **Agent Name:** Stratland LLP

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** Consultation Process

**Location:**

**Comment made on the Proposed Change:**

**Support:**

The Council's Guidance Note for completing the Comment Form states 'We are only accepting comments that relate to the amendments or rejected site allocations identified in the Schedule of Core Strategy Amendments.' This statement is not clear. To comment on the amendments it must be possible to comment on the absence of an amendment. The purpose of the amendments is to respond to concerns expressed by the Inspector and it must therefore be possible to comment on matters that address the questions about whether the Council has responded adequately to those concerns. Comments are ultimately addressed to the Inspector and it is not for the Council to accept or reject comments at this stage.

A fundamental problem with this consultation on Core Strategy Amendments is that it is being conducted in advance of completing the examination of the SHMA's assessment of future housing requirements, which are to be heard on 10th and 11th December. The justification for Green Belt releases relies on the scale of housing requirements in the District (and the local needs of specific settlements) to weigh against the importance of maintaining the existing boundaries of settlements and Green Belt. Without agreement on the scale of housing requirements, it is not possible to resolve the balance to be struck between those requirements and the claims of maintaining areas of Green Belt.

In its note BNES/51 on Background to the Proposed Amendments, the Council stated that its full explanation of amendments to Policy DW1 would be set out in its response to ID/42 by 22 November – after the start of the consultation on 11 November. This document (BNES/52) is far from easy to follow; it omits important information about the revised

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SHMA approach to housing requirements; it does not provide adequate referencing of sources; and it contains several obvious errors.

There were difficulties with the previous consultation on Proposed Changes (commented on in ID/32) when not all relevant information was made available at the start of the consultation period. In ID/40 the Inspector advised the Council to give itself time to put forward its changes thoroughly and with careful explanation of its reasons. Further explanation is still required of the approach to housing requirements described in BNES/52 and this limits the effectiveness of consultation on the Schedule of Core Strategy Amendments

**Change to the policy requested:**

As this consultation is being undertaken on the basis of figures for housing requirements that are still being examined, it is also necessary to comment on the absence of amendments and the omission of sites that would contribute to a higher and more appropriate housing target.

**Respondent Number:** 4959 **Comment Number:** 2 **Respondent Name:** Ms Andrews

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** Consultation Process

**Location:**

**Comment made on the Proposed Change:**

**Support:**

I write in anger & concern about the housing estate proposed for the edge of Keynsham, with access from Teviot Road. I find it scandalous we have only learnt about this from a neighbour who works for BANES, and is obviously as outraged by this ridiculous plan, deliberately kept quiet – not one Teviot Road resident knew about it!

**Change to the policy requested:**

**Respondent Number:** 5003 **Comment Number:** 2 **Respondent Name:** Mr & Mrs Smart

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** Consultation Process

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Lack of communication, as we were only notified by a neighbour just a day before event.

**Change to the policy requested:**

**Respondent Number:** 5048 **Comment Number:** 1 **Respondent Name:** Christine Bateman

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

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Further to my e-mail of 15th December, I wish to register a protest regarding the timing of the delivery of the Core Strategy Update on the 17th. This gives further disturbing information, but gives virtually no opportunity for specific comments to be made. If this was deliberate it seems a cynical ploy to avoid controversy.

**Change to the policy requested:****Respondent Number:** 5073 **Comment Number:** 2 **Respondent Name:** Peter & Debbie Holland**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** Consultation Process**Location:****Comment made on the Proposed Change:**Support: 

First we would like to complain that this 'Public Consultation' has NOT been made sufficiently public to the community of East Keynsham by Banes Council.

We, the residents immediately next to the the East Keynsham Greenbelt lands in question knew nothing about ANY proposed building plans (amendments or otherwise) until 2 days ago (Sat 14th December 2013). I immediately conducted a survey of 50 of the properties closest to the proposed adjoining land (those properties in Teviot Road, Windrush Road and Minsmere Road) AND NOT ONE OF THE LOCAL RESIDENTS WHOSE AMENITIES AND LIVES WOULD BE MOST DIRECTLY EFFECTED BY THE CORE STRATEGY KNEW ANYTHING ABOUT THESE PLANS (amendments or otherwise).

In our view, whatever 'publicity' Banes Council think they may have carried out has NOT been adequate. This indicates negligence and makes a mockery of the 'public consultation process' as intended by the law. There is the letter of the law, and then there is the 'spirit' behind a law. 'Public Consultation' means talking to people at the heart of the community, within the immediate vicinity, who will be most effected by the developments. We are truly surprised and disappointed by the council's lack of transparency during this very important approach to this core strategy planning. The community now have only a matter of a couple of days to try to make some kind of response to this most shocking and surprising news. This is not 'timely consultation' by the council – we have the evidence covering 50 local East Keynsham properties to prove this negligent/unethical/immoral approach by BANES planning department.

Whoever it was attending prior meetings, it was most certainly NOT the residents most local to East Keynsham Greenbelt fields.

Furthermore, the two forms made available online of residents to fill in and send to this email address are so badly written in bureaucratic jargon as to make impossible to fill in by the average member of the public, whose opinion BANES are supposed to be eliciting. Not one of the local residents we have talked to are able to decipher what the two forms are actually asking and why they were written in presented in such an over-complicated manner. Surely a public consultation on core strategy is about gaining the opinion of local people, not to dissuade them from commenting in every manner possible – first by keeping the plans under wraps, and then producing forms which are meaningless to everyone except the town planning professional.

At 16.41 today we spoke to Simon De Beer, team manager for Planning Policy & Environment at BANES, and he agreed two things:-

1. He agreed, on the on the evidence that none of the 50 residents most local to the planned greenbelt location of East

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Keynsham had heard of the plans or amendments to the core strategy, his attempts at public consultation had, in fact failed. He agreed to immediately post out tomorrow (Monday 16th December 2013) a minimum of 500 letters in the roads closest to the proposed development which include Teviot Road, Minsmere Road and Windrush Road advising as the consultation process and the deadlines involved.

2. He agreed that filling in the two forms were not actually necessary if local people wanted to voice their opinions and residents could simply email into this office with their views – and the emails will go to the inspector directly and he will note and follow up on all comments sent in by email to this address – whether or not they are accompanied by forms. And assured us that any such emails will not be binned or ignored due to some bureaucratic loophole about amendments or some other complication the public do not comprehend.

**IMPORTANT QUESTION:-**

If this is NOT the case, and there is some hidden loophole about ‘amendments’ (whatever they are), or anything else that will discount emails sent to this address, please advise VERY QUICKLY - and explain in layman’s terms EXACTLY WHAT PEOPLE NEED TO DO TO BECOME HEARD IN THIS PROCESS OF PUBLIC CONSULTATION. TIME IS FAST RUNNING OUT.

There is a fast growing fury locally at the way this is being handled - not only from the residents local to East Keynsham, but also from the Keynsham community outside the immediate area of East Keynsham.

**Change to the policy requested:**

**Respondent Number:** 5121 **Comment Number:** 1 **Respondent Name:** Mr & Mrs A R Emery

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** Consultation Process

**Location:**

**Comment made on the Proposed Change:**

**Support:**

Public Consultation:

We were totally unaware of the proposals to build on Green Belt land behind Napier Road. There has been no direct consultation with us or any of the neighbours. We now understand that the proposals were advertised in the Bath local paper and published on the Council’s website. As most of us do not take the evening paper and would have no reason to go onto the Council website then how on earth were we ever going to know the forward planning, if it was not via “word of mouth”. Totally unacceptable!

**Change to the policy requested:**

**Respondent Number:** 5139 **Comment Number:** 7 **Respondent Name:** Mr & Mrs D. Perry

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** Consultation Process

**Location:**

**Comment made on the Proposed Change:**

**Support:**

1. Public Consultation

We consider that the proposed Core Strategy Amendments (November 2013) (in particular CSA26, CSA28 and CSA25),

together with Proposed Changes to the Core Strategy, consulted upon earlier this year (CD9/PC6) (relating to green belt land at Weston) do not accord with elements of the NPPF (in particular paragraph 155) and the Council's "Neighbourhood Planning Protocol" (September 2012).

Paragraph 155 of the NPPF states that "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential..."

Paragraph 150 states that "Local plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities..."

The Council's Neighbourhood Planning Protocol states that In relation to getting involved in local planning policy "we have identified a range of target groups we need to make extra effort to engage...consultation with and participation from these groups will be targeted depending on the nature of local policy". (p.22)

In terms of the "Residents" target group, the Protocol states that "We acknowledge the need to ensure all residents in the district have opportunities to be involved in planning issues". It goes on to state that "Information about a variety of opportunities to be involved in the preparation of the Local Development Framework (LDF) will need to be disseminated widely, and advertised in good time".

"It is noted that unlike residents in the rest of the district, residents of Bath are not represented by either Town or Parish Council and that extra effort is needed to reach these residents"

The Protocol notes that Appendix B (although we think this is meant to refer to Appendix A) is a toolbox of methods which the Council will use to encourage community involvement in the creation of the LDF and go beyond statutory minimum requirements (our emphasis) (p.23).

The Community Involvement Toolkit at Appendix A states that with reference to proposed site allocations (i.e. as per the proposed site allocation in Weston (CSA26, CSA28 and CSA25)) "Notification by letter of development proposals under consultation in local area. Letters sent to addresses in the vicinity of a proposed site allocation. The size and parameters of the area are to be determined by the size and nature of the site allocation proposed".

Given that the proposed release of land from the green belt and the proposed strategic site allocation (CSA26, CSA28 and CSA25) is on land to the rear of our property we consider that the total lack of communication regarding the proposals fails to follow the requirements of the NPPF and the Neighbourhood Planning Protocol set out above and in this regard means that the Core Strategy Amendments (CSA26, CSA28 and CSA25) are not legally compliant and fail the test of soundness relating to being consistent with National Policy (i.e. para 155 of the NPPF).

We were not informed (and unaware) of the proposals to identify land off of Lansdown Lane as a broad strategic location where land should be removed from the Green Belt (the subject of the Proposed Changes to the Core Strategy, consulted upon in March this year) and likewise we were completely uninformed of the proposed strategic site allocation and green belt boundary amendments and the public consultation events the subject of the current Proposed Amendments (CSA26, CSA28 and CSA25). Again, we learned about the event from our neighbours. We now understand that the proposals were advertised in the Bath Chronicle and published on the Council's website, but these limited methods of communication failed to reach us and many of the residents in the local area.

The Neighbourhood Planning Protocol refers to the need to ensure all residents have the opportunity to be involved in the preparation of the LDF and information about such opportunities should be widely disseminated and advertised in good time. Instead of receiving a letter notifying us of the proposals which would have been in line with the Neighbourhood Planning Protocol, on both occasions we discovered the proposed changes to the Core Strategy through our neighbour and have sought to inform other neighbours who also knew nothing of the proposals. In addition we note that the public consultation event in Weston was advertised on the 11th November and took place only 3 days later during the day. This provided very limited time and opportunity for residents who were keen to attend (in direct conflict with the requirements of the Neighbourhood Planning Protocol and no doubt resulted in a much poorer attendance than would have occurred should the event have been properly advertised, advertised in good time and set at a time of the day where all interested parties (including those who work during the day) could attend.

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Furthermore, we understand that the Council advised locals (as part of the consultation in March on the identification of broad strategic locations where land should be removed from the Green Belt) that the identification of strategic sites and amended Green Belt boundaries together with Placemaking Principles would be established with full public consultation and local engagement through the Placemaking Plan. Instead, it appears that the Council has failed to fully consult or engage with the local community and instead put forward strategic sites and Green Belt boundary changes under strict time pressure to address shortcomings of the Core Strategy. The lack of opportunity to be involved in this aspect of plan making is not in accordance with the Neighbourhood Planning Protocol and in this regard the Core Strategy amendments CSA26, CSA28 and CSA25 are not considered to be legally compliant under s20(5)a of the 2004 Act. In this regard we consider that CSA26, CSA28 and CSA25 should be revised to remove reference to the strategic site allocation and associated green belt boundary changes of land to the west of Lansdown Lane.

In addition, the petition signed by over 750 local residents against the proposed development in Weston clearly shows the strength of local opposition against the proposed allocations and development. Adopting such proposals as part of the Core Strategy would be totally against the spirit of localism and would result in a Core Strategy which does not reflect the desires of the local community (failing to accord with para 150 of the NPPF which states that "Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities...").

Change to the policy requested:

### Change Reference: General Comment

Respondent Number: 95      Comment Number: 1      Respondent Name:      Respondent Organisation: The Coal Authority

Agent ID:      Agent Name:

Further Information available in the original comment?       Attachments sent with the comment?

Change Reference: General Comment

Location:

Comment made on the Proposed Change:

Support:

Thank you for consulting The Coal Authority on the above document.

Having reviewed the proposed amendments, I confirm that we have no specific comments to make at this stage.

As a specific consultation body we obviously wish to continue to be consulted on future planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk), on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).

Change to the policy requested:

Respondent Number: 222      Comment Number: 3      Respondent Name:      Respondent Organisation: Duchy of Cornwall

Agent ID: 126      Agent Name: Woolf Bond Planning LLP

Further Information available in the original comment?       Attachments sent with the comment?

**Change Reference:** General Comment**Location:** Comment on Alternative Options**Comment made on the Proposed Change:**Support: 

Land West of Twerton

3.27. Our May 2013 submission also set out the merits of the land west of Twerton in relation to the consideration of the impact of development in this location upon the Bath World Heritage Site. The content of those submissions is relied upon here and we will expand upon the content at the subsequent examination sessions as necessary.

3.28. It appears that the sole reason in the overall planning balance undertaken by the Council not to allocate land west of Twerton for development is in relation to the perceived adverse impact upon the Bath World Heritage Site (“WHS”). However, and as evidenced in documentation provided to English Heritage, land west of Twerton represents an opportunity to provide for a sustainable mixed use urban extension in the form of a new neighbourhood to provide for up to 2,000 dwellings together with employment provision (at a ratio of 1 job per dwelling), open space, community facilities and sustainable

3 Paragraph 115 of the NPPF makes it clear that great weight should be given to conserving Areas of outstanding Natural Beauty which have the highest status of protection in relation to landscape and scenic beauty. Linkages to the city centre in a sympathetic manner, thus respecting the setting of the WHS.

3.29. A number of technical studies have been undertaken to inform preparation of the masterplan for the site. This thorough and robust evidence base demonstrates how the masterplan for 1,500 to 2,000 dwellings and employment provision, inter alia:

- Addresses archaeology
- Preserves the hillside approach from the west by restricting development to below the plateau thus avoiding impact on the setting of Newton St Loe and respecting the visual setting of Kelston Park

Preserves views to Seven Acre Wood from the WHS

- Creates sustainable linkages between Bath Spa University at Newton Park and Bath through the site. Potential for pedestrian and cycle linkage to Twerton. There is also the potential to make existing bus routes more viable and the possibility of creating a future rail halt.

3.30. This minimisation of adverse impacts must be balanced against the positive way that a sustainable urban extension can address other core planning principles, including meeting identified need within a mixed tenure, mixed use community, providing amenities and service to the adjacent area of Twerton, enhancing existing public transport links to Newton Park, and meeting housing need without impacting on the AONB.

3.31. As per our detailed submissions, contained in various representations and participant statements, it is clear from the analysis of the evidence base that the heritage status of Bath would not be significantly or adversely affected by the proposed development West of Twerton.

3.32. As regards the planning balance set out in the NPPF the potential benefits of the scheme in terms of providing additional housing and employment opportunities, together with the potential to revitalise the Twerton area are all then factors to be taken into account which can be considered in the context of the advice in the NPPF.

3.33. We also question the soundness of the plan in relation to the lack of an appropriate spatial contingency to be drawn upon in the event of a failure of the plan to deliver the requisite amount of housing both during the plan period and on a rolling annualised basis.

3.34. Guidance in relation to the need to plan for contingency and provide for a flexible strategy to deal with changing circumstances is set out in the NPPF (para 23, bullet point 3 and paras 157 and 182) and Examining LDFs (paras 11 and 13).

3.35. For the reasons set out above, a spatial contingency should be an explicit part of the CS. This could include the identification of the west of Twerton urban extension as a reserve site to come forward in the event that it is needed to meet identified housing needs. And the site should be inset from the Green Belt; which approach is supported in the

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

evidence base to the Core Strategy.

3.36. In this context, and for the reasons previously stated, we question the flexibility of the Core Strategy particularly if the brownfield first strategy (focusing upon the Western Riverside) fails to deliver housing numbers at the envisaged rate and/or if they have less housing capacity than planned due to, inter alia, flood constraints.

Summary: Suggested Changes

3.37. To conclude, land west of Twerton provides an opportunity to provide for a mixed use sustainable urban extension to provide for up to 2,000 dwellings together with associated employment provision, open space and sustainable linkages to the city centre without serious conflict with the overall purpose of the Green Belt.

3.38. We are concerned about the Council's overall approach to assessing the sites to be identified for housing in meeting the increased housing requirement including through a review of the Green Belt.

3.39. The Amendments to the Core Strategy fail to undertake a robust and/or appropriate review of the Green Belt in order to allow the boundaries to endure beyond the plan period, as required by the NPPF.

3.40. Insufficient weight has been attached to the importance of retaining land within the AONB as per the approach set out in the NPPF (Para 115).

3.41. There is a lack of a detailed comparative assessment of the proposed allocation sites having regard to their respective impact on the WHS.

3.42. Finally, we are of the view that an erroneous planning balance has been applied as a result.

3.43. Should the Inspector be of the view that the Core Strategy fails to provide for sufficient flexibility in meeting identified housing needs and/or finds the Plan unsound in relation to the planning balance and judgments applied to the Green Belt Review and the subsequent site selection, the Duchy of Cornwall's land continues to be available to meet identified housing needs and can provide for a sustainable urban extension for around 2,000 dwellings together with associated employment and infrastructure provision as well as sustainable linkages to Twerton and beyond to the centre of Bath.

3.44. Against the above background, the Core Strategy should be amended as follows:

- Identify land west of Twerton either as a baseline allocation or as a reserve site to be relied upon in the event that components of supply relied upon by the Council fail to come forward at the rate envisaged

**Change to the policy requested:**

**Respondent Number:** 4447 **Comment Number:** 1 **Respondent Name:** David Payne

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** General Comment

**Location:** Land adjoining Odd Down

**Comment made on the Proposed Change:**

Support:

My wife and I support the changes that remove some of the South Stoke Plateau from the SSA. However the changes do not go far enough. None of the South Stoke Plateau should be removed from the Green Belt. The plateau is part of the Cotswolds AONB and it is essential that it remain Green Belt to limit creeping urbanisation and to protect the WHS status of Bath. We find fiddling with the Green Belt boundaries just because it's "convenient" is simply unacceptable. Build on the Brown Field sites! And do it first!

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**Respondent Number:** 4456 **Comment Number:** 1 **Respondent Name:** John Fielding  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** General Comment

**Location:** Comment on Alternative Options

**Comment made on the Proposed Change:**Support: 

This is a comment on a rejected site, which is BNES 51 is identified as area A1. Some location maps cover my land as K1 (the southern – lower half of Cell A1). BNES 51 does not differentiate and its comments for rejection of this are include the whole of A1. Most issues being considered, whether WHS setting, AONB Assessment or slope and geology associated with flood risk, all appear to be mitigated on the lower – southern (for Weston) slopes. I would like “K1” to be considered before some of the other sites or a proportion of these sites. Both seemed to be built below certain contour lines which worked for a City built in a natural bowl and preventing “sprawl”. Sometimes would “first impressions” and “approach” be more important criteria than WHS setting and AONB assessments. The current proposal appear to someone approaching the city from the Racecourse to be “fringe” or “arterial” development whilst I am suggesting looking at smaller parcels (as mine) within the relevant contour line before committing to developments outwards on the routes into the city.

**Change to the policy requested:**

Looking again at K1 part of Cell A1 using Blind Lane for this small development, which is an adopted Highway, for access.

**Respondent Number:** 4511 **Comment Number:** 1 **Respondent Name:** Gareth Herincx  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** General Comment

**Location:** No comment on Strategic Sites

**Comment made on the Proposed Change:**Support: 

Before I explain why I am objecting to the council’s amendments to the Core Strategy to allocate precious green belt around Bath for housing, I would officially like to state that I believe the consultation process is flawed.

Not only is it far too complex for most people (ie filling in two MS Word format forms which have to be saved and filled in locally - they then have to be attached to an email and sent to an email address), but I don’t think it was adequately publicised.

Apart from two small events in South Stoke Village Hall and St Gregory’s Catholic College (both of which were only advertised in the Bath Chronicle and on the B&NES website from what I could see). In fact, a council consultation on a possible 20mph speed limit in Combe Down earlier this year was far better publicised – EVERYONE in our road and neighbouring roads received a leaflet through the door with a simple response form!

**Change to the policy requested:**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.**

**Respondent Number:** 4511 **Comment Number:** 3 **Respondent Name:** **Respondent Organisation:** South of Bath Alliance  
**Agent ID:** **Agent Name:**  
**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** General Comment

**Location:** No comment on Strategic Sites

**Comment made on the Proposed Change:**  **Support:**

Not only is it far too complex for most people (ie filling in two MS Word format forms which have to be saved and filled in locally - they then have to be attached to an email and sent to an email address), but I don't think it was adequately publicised.

Apart from two small events in South Stoke Village Hall and St Gregory's Catholic College (both of which were only advertised in the Bath Chronicle and on the B&NES website from what I could see). In fact, a council consultation on a possible 20mph speed limit in Combe Down earlier this year was far better publicised – EVERYONE in our road and neighbouring roads received a leaflet through the door with a simple response form!

**Change to the policy requested:**

**Respondent Number:** 4633 **Comment Number:** 1 **Respondent Name:** Louise Worlock **Respondent Organisation:** C/O Aspect360 Ltd

**Agent ID:** **Agent Name:**  
**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** General Comment

**Location:** Comment on Alternative Options

**Comment made on the Proposed Change:**  **Support:**

SUGGESTED SITE – LAND EAST OF KEYNSHAM  
The BANES Green Belt Review identifies that the development of all of these areas for urban extension would prejudice the openness of the Green Belt and the purposes of including land within the Green Belt. We do not disagree with this summary but would contend that the approach of only providing the large urban extensions proposed would be more harmful to the character of the countryside and the openness of the Green Belt than the development of smaller parcels of land which adjoin and infill the fringe areas of towns and villages which would enable urban areas to be contained but the critical mass of residential units to be achieved.

In particular development to the East and South-west of Keynsham would result in a much larger urban area that would threaten the very character of the settlement and cause substantial urban sprawl. This proposed area of extension should be reduced with some development allocated on the land to the north-west of Salford as shown on the attached plan.

The proposal to extend the urban area of Keynsham to the east should be reconsidered for the following reasons:-

A smaller amount of development would be better located on the area to the west of Salford as annotated on the attached plan .

This land is immediately available for development, has excellent access along the Bath Road A4 corridor where there is an established public transport network and a strategic cycle path. Primary schools, shops.

REJECTED SITE - K28 West of Grange Road

We strongly object at the cursory process of considering this site.

The site in control of our clients is shown in the summary of the Findings Report on page 3 (under ' ) to have a capacity of around 50 dwellings. The site is located on the south side of the A4 adjoining Saltford and close to the main facilities of the village.

For the purposes of the assessment the Council has included the site is included within the assessment of K28 and K27b on page 22 because it forms part of a much larger site which is mostly under the control of Mactaggart and Mickel.

In response:

- 1) The site is to the south of the A4 and there is no connectivity with the land to the north referred to in K28.
- 2) The land is not within the control of Mactaggart & Mickel
- 3) No gas pipe running through our land
- 4) The council are also making assumptions that the developer will not pass funds to support investing in the A4 to support the additional traffic.
- 5) How do the Council know anything about the costs of developing this land until you have costs and explore this with the developer to see if it is viable.

The Council have not assessed the land as an isolated development area which would be ideal for a modest increase to Saltford. The Council have conjoined the site to an adjoining site which has been submitted which undermines any potential for this site to be developed when in isolation when the site has excellent access and is unconstrained by any pipeline.

The land is not visually prominent and is physically contained within the mature hedgerows that surround the site.

The site in question measures 3.3 hectares and could support approximately 60 dwellings without causing any significant harm to the openness of the Green Belt or the character of the countryside. The land would be contained within the existing hedgerows and is free from significant development constraints.

The site:

- Is in Flood Zone 1 Contains no Tree Preservation Orders;
- Contains no nature conservation designations
- Has no conservation constraints (Listed Buildings or Conservation Areas)
- Is not visually prominent
- Is within walking distance of the local school and shops
- Is within 5 miles of Bath city centre, 7 miles of Bristol city centre, 2.0 miles of Keynesham Town Centre and less than 0.5 miles of Saltford village centre and local primary schools.

A further factor to consider is the deliverability of development. 60 dwellings on a site of this scale could be delivered immediately without requiring significant infrastructure. The same cannot be said for land to the east/north of Keynesham which lies upon significant infrastructure provision. The reliance on major urban extensions to provide a substantial number of homes will not deliver the required number of new homes at an early stage in the Local Plan. Additional smaller sites for housing should be allocated as alternatives to ensure sufficient choice and flexibility for new development in this area. As the attached annotated plan demonstrates, the allocation of the land on the north-western edge of Saltford will enable the strategic Green Belt gap between Keynesham and Saltford to be retained.

There will be no adverse impact on the main reasons for including land in the Green Belt . Neighbouring towns will not merging into one another.

- Encroachment into the countryside will be significantly less than if the large urban extensions are provided;
- The setting and special character of historic towns will not be impacted;
- The proposal will have a neutral impact on urban regeneration when compared with the large urban extension of Keynesham.

**Change to the policy requested:**

That land at Saltford is allocated for development of 50 houses and the development at Keynesham is restricted in size. This will allow some organic growth at Saltford.

A larger number of more modest developments would be more likely to be realised in the short term rather than being

landbanked by a larger developer.

**Respondent Number:** 4695  
**Comment Number:** 1  
**Respondent Name:** Richard Hemmings  
**Agent ID:**  
**Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** General Comment

**Location:** Comment on Alternative Options

**Comment made on the Proposed Change:**

Support:

I am appealing against the exclusion of Land in West Keynham, the land south of KEJUPARI Farm St Francis Rd BS31 2EB. This land represents an excellent opportunity to provide additional housing whilst retaining it's identity as a community due to the natural boundary of Stockwood Vale. The land is also at very low risk of flooding and is within walking distance to Keynsham High Street, Broadlands Academy, local Primary Schools and other local amenities.

**Change to the policy requested:**

I would like the land mentioned in 7. to be included in the Placeholderplan for the future development of Keynsham

**Respondent Number:** 4695  
**Comment Number:** 4  
**Respondent Name:** Richard Hemmings  
**Agent ID:**  
**Agent Name:**

**Respondent Organisation:**

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Change Reference:** General Comment

**Location:** Comment on Alternative Options

**Comment made on the Proposed Change:**

Support:

3.11 In his note in relation to the Core Strategy dated 26th July 2013 the Inspector has quite rightly raised concerns regarding the process of assessment that has been undertaken to assess where potential land in the green belt could be released for development.

3.12 The PMP launch document now simply brings forward the assumptions made in the Core Strategy about Green belt land release, without the Inspector's concerns being addressed and a final Core Strategy adopted this is a flawed approach to plan making.

3.13 Our analysis of the available evidence suggests that the assessment of potential site's in the Green Belt, and in particular on the western edge of Keynsham, has been limited.

3.14 Therefore we urge the council to look again at the Green belt as a whole, but also specifically west Keynsham, to assess whether any land could be released in this area to assist in meeting their housing requirements and five year land supply deficit and associated historic shortfall.

Keynsham

3.15 Given that Keynsham is the second largest settlement in BANEs and provides a wide variety of shops, services and employment opportunities as well as being provided with good train and bus links to both Bristol and Bath means that it would be a logical location for the identification of further reserve sites in the emerging plan.

3.16 In relation to the potential eventuality 3 identified above, given the large number of houses that are to be delivered on Brownfield land in Keynsham this is particularly salient. Many of these sites have various constraints arising from the previous usage which means that the potential for one or more of these sites to remain undelivered past the current plan period cannot be discounted and therefore a fallback strategy is essential incase this occurs.

3.17 Accordingly we propose that an assessment of reserve sites should be undertaken now to identify a secondary tier of sites that could come forward at a later stage in the plan period or to meet an undersupply in five year housing land. In order to do this a review of sites located adjacent to the urban edge of Keynsham should be undertaken as part of the plan making process.

3.18 We consider that land owned by my Client located on the western edge of Keynsham should be included in such a review.

#### 4.0 LAND WEST OF KEYNSHAM

4.1 The land identified in appendix A is currently in the control of our client.

4.2 The land consists of two large arable fields to the southern part of the site and three separate rough grazing parcels to its northern edge. Access into the land is provided via St Francis Road.

4.3 This site measures 8.3 hectares in size and could potentially accommodate up to 208 dwellings to reflect its transitional urban edge location and the density of surrounding development.

#### Sustainability

4.4 The site is well located in relation to the existing settlement boundary of Keynsham and the service centres it provides, namely the Town Centre and Queens Road Local centre. In summary the edge of the site lies within the following approximate distances of key facilities:

- Town Centre = 900 metres
- Queens Road = 650 metres
- Nearest Bus Stops = under 50 metres
- Keynsham Train Station = 1,500 metres
- Broadlands Academy = 400 metres
- St Keyna Primary School = 500 metres

4.5 The Manual for Street's (MFS) discusses the need to create walkable neighborhoods which it defines as being area that provides a range of facilities that residents can comfortably reach on foot. It refers to the ideal that such facilities be located within a 10 minute walk away from development, or up to 800m but explains this should not be seen as an upper limit.

4.6 Given that the town centre is located marginally over 800 metres away from the site, and a wide range of other key facilities lie within an easily walkable distance of the site it is considered that the development of the site would meet favorably with the principles of MFS's.

4.7 PPG13, which MFS refers to, stated that walking offers the greatest potential to replace short car trips, particularly those under 2km. This site lies clearly within these limits.

4.8 In light of these factors we consider that the site offers a sustainable location for potential new residential development which will maximize opportunities to travel by means other than the private motor car and also strengthen and reinforce the existing town centre of Keynsham and the Queens Road local centre.

4.9 In connection with plan making paragraph 14 of the NPPF clearly sets out how authorities should consider how to accommodate their development needs. Specifically this states that the housing needs of an area, including allowances for flexibility, should be met unless the adverse effects of releasing land to meet these needs would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF taken as a whole.

4.10 The site is currently open fields and as such has little recreational, biodiversity or ecological benefit. Apart from its Green belt Status it also has no specific landscape designation and no other designations in relation to flood risk or heritage apply to it (see figure 1 below).

Figure 1: Extract of Local Plan Proposals Map

## Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.

4.11 The site does lie adjacent to a site of Nature Conservation interest. This feature will be of local value and any future development of the site could incorporate mitigation measures such as buffer planting that would avoid any adverse impacts on this feature.

4.12 Its development for housing could accommodate extensive planting and landscaping which would integrate it into its surroundings and provide much greater biodiversity benefit that it current offers. Accordingly our preliminary view is that no adverse impact would arise from the development that would outweigh its benefits.

4.13 The site is also served by access provided via St Francis Road and if this proves to be inadequate various access options could be pursued via Lays Drive, Westfield Close or Heathfield. The site is ready for development now and no other significant constraints would prevent the site from being delivered within five years.

4.14 In conclusion we consider that the site offers a sustainable location for development being located within walking distance of the town centre of Keynsham, the smaller centre of Queens Road and train and bus links. Furthermore our preliminary view is that no significant constraints would apply to the development of the site and therefore the site should be considered for inclusion in the emerging plan for residential development.

### 5.0 Conclusion

5.1 In summary we have concerns regarding the emerging Placemaking Plan because the launch document does not deal with the substantial issues that have been raised by the Planning Inspector when examining the emerging Core Strategy. The most salient of these issues include:

- Concerns regarding the housing requirement for BANES as a whole;;
- Concerns over delivery of housing and the need for measures to encourage housing to be delivered sooner in the plan period;;
- Required BANES to consider historic shortfall and the need to apply a 20% buffer because of persistent under delivery to its 5 year housing land supply;;
- Affordable housing requirements needed further analysis;;
- Further work was required to sequential and exception flood risk tests;; and
- Concerns about the analysis of the evidence base that has underpinned the current strategy in relation to the Greenbelt.

5.2 Any further work on the Placemaking plan, prior to these issues being addressed, would be flawed and premature and result in a submission plan that was unsound.

5.3 In addition to this key concern the emerging document is currently unsound as it plans for insufficient housing growth within BANES. In particular it does not accommodate any flexibility to deal with rapid change and is therefore non-compliant with the NPPF.

5.4 In order to be flexible we consider that reserve sites need to be considered for both employment and residential development to allow flexibility. Such sites should be selected on sustainable sites on the edges of existing primary urban areas such as Bath, Keynsham and Midsomer Norton.

5.5 The site we have identified at west Keynsham is considered to represent a sustainable option for housing growth and therefore the council should consider allocating this land as part of the emerging plan unless the adverse affect of doing so outweighs the benefits. We do not consider that any adverse affects can be identified in this regard.

5.6 Therefore we commend this site to the council for allocation in the emerging plan once the Core Strategy is adopted.

**Change to the policy requested:**

**Respondent Number:** 4803 **Comment Number:** 11 **Respondent Name:** Simon Steel-Perkins

**Respondent Organisation:** Waddeton Park Limited

**Agent ID:** 128 **Agent Name:** Peter Brett Associates

**Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** General Comment**Location:** Comment on Alternative Options**Comment made on the Proposed Change:**Support: 

21. There has been no mechanism for the site at Minster Way, Bathwick, Bath, to be brought forward. The site is shown on attached plan. It was considered in the SHLAA and not specifically considered in the green belt assessment,. Indeed there was no appropriate process or consultation which allowed it to be suggested and considered as a potential development site. As such it has never been considered and should have been. It is not at all clear where, when and how non strategic deliverable sites, that could be removed from the green belt and make an important contribution to the five year supply are going to be considered. As set out above this is a major failing of plan as it has emerged and means that it is severely compromised and in its present form cannot be found sound.

22. The site at Minster Way Bathwick, Bath is a green belt site which should be released very early on. It does not serve any green belt purpose and has highly defensible boundaries. The plan below demonstrates that removing the site from the green belt would continue a logical boundary and allow housing to be provided up to a more defensible long term boundary. It should be noted that it is adjacent to a school to the west which is not in green belt, and that the site cannot grow beyond its boundaries because the National Trust own the land to the south and east. Despite being close to sites of ecological interest, there are no ecological issues within the site.

23. The site at Minster Way Bathwick is in a highly sustainable location. This is recognised by the Council's identification of the MoD site on Warminster Road, as suitable for housing. The area has excellent access to Bath City Centre which is only one mile away. It relates well to the existing housing and has excellent ready-made access from Minster Way. Consequently, there are no constraints which preclude development for development and this site is an ideal site for development which would make a significant contribution to the housing needs of Bath.

**Change to the policy requested:****Change Reference: Proposed Alternative Sites****Respondent Number:** 837 **Comment Number:** 2 **Respondent Name:** David Redgewell**Respondent Organisation:** South West Transport Network Railfuture**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?** **Change Reference:** Proposed Alternative Sites**Location:****Comment made on the Proposed Change:**Support: 

Keynsham Parkhouse Farm could also be allocated for housing development due to sustainable location of the public transport network between Keynsham and the new development at Whitchurch.

**Change to the policy requested:****Respondent Number:** 837 **Comment Number:** 8 **Respondent Name:** David Redgewell**Respondent Organisation:** South West Transport Network Railfuture**Agent ID:** **Agent Name:****Further Information available in the original comment?**  **Attachments sent with the comment?**

**Schedule of Comments on the Proposed Changes to the Submitted Core Strategy: Sorted by Change Reference.****Change Reference:** Proposed Alternative Sites**Location:****Comment made on the Proposed Change:**Support: 

Bath housing site at Foxhill, Odd Down, Weston Riverside and Weston compare badly in terms of the need to plan for growth and to provide housing for rent and affordability in line with NPF link to good public transport. The Bath Transport Package will allow 12 showcase quality city bus services to be developed around new housing areas. Land between Twerton, Southdown and Newton St Loe should be allocated for housing. Saltford station would allow growth.

**Change to the policy requested:**
**Respondent Number:** 5161 **Comment Number:** 1 **Respondent Name:** Caroline Dawson

**Respondent Organisation:**
**Agent ID:** **Agent Name:**
**Further Information available in the original comment?**  **Attachments sent with the comment?** 
**Change Reference:** Proposed Alternative Sites**Location:** Comment on new sites**Comment made on the Proposed Change:**Support: 

SHLAA

The site was assessed in the SHLAA in late 2012 and reported in March 2013 as "there is no evidence that any land in this area is available for development." The SHLAA of November 2013 (Appx 1b, Area 08) reached the same conclusion without first checking the accuracy of the assumption. I can confirm, however, that the land owned by my clients, as shown on the attached plan, is available for development and, in terms of the NPPF and the LPA's needs regarding land supply, this is a material factor to be taken into account.

In terms of other conclusions of the SHLAA analysis of the area around my clients' site, I would comment as follows;

The area is sloping but that is the characteristic of Bathampton and there is already established housing on the valley sides. There is no evidence on which to assume that managed development in this location should be unreasonably intrusive.

The area is not heavily treed. It comprises open fields with treed and hedged boundaries. Development would not, therefore, result in the loss of woodland character which is of importance to the setting of this suburb of Bath. It is accepted as inevitable in Bath that new housing will result in the loss of greenfield sites and those at Bathampton have no particularly valued status.

Development in this locality is not "linear" as it is the suburb of Bathampton which stretches North to South as shown on the attached plan. There are already "estate" type developments on this side of the valley, at Hantone Hill, alongside my clients' site. The introduction of development here would not, therefore, have the harmful impact presumed but not proven in the SHLAA.

My clients' site is some distance from the Scheduled Ancient Monument which lies to the South and is not noted as particularly important in the Setting of the World Heritage Site in the Council's specific SPD of 2013. The land lies beyond the ridge line and outside the plateau area. Whilst it falls within the defined green hillside, that designation applies to the vast majority of the undeveloped land in and around Bath. It should also be noted that the SPD does not prohibit development in the setting of the WHS but aims to manage it via proper assessment and design.

The claim in the SHLAA that it would be difficult to mitigate development in this area is unjustified by the evidence captured in the Assessment.

The SHLAA is not, therefore, a valid and defensible evaluation of the site's potential to contribute to the needs of housing delivery in the area.

**INSPECTOR'S NOTE ID/36 PARAS 23-27**

The above comments on the findings of the SHLAA are also relevant in considering the LPA's response to the Inspector's Note on the Core Strategy. At page 36 of BNES/47, Table 8 explains why the LPA has discounted the housing potential of small sites at Bathampton and this, in part, relies on the assumptions in the SHLAA which are incorrect (as explained above). In addition, my clients' land to the rear of Warminster Road is easily accessible by bus and cycle routes which run along this road.

The NPPF requires the LPA to plan for sustainable development but it appears that the Council's interpretation focuses too heavily on transport access rather than the 3 foci of sustainability set out in the NPPF para 7. In particular the social role of maintaining healthy and strong communities by "providing the supply of housing required to meet the needs of present and future generations .... With accessible local services that reflect the community's needs and support its health, social and cultural well-being."

The Core Strategy, as it stands, appears to rule out new housing in Bathampton. Such an approach fails to properly plan for the long-term sustainability of the settlement, providing for the future of its inhabitants, ensuring support for key local services which facilitate sustainability and encouraging the viable maintenance of public transport.

There is, in my opinion, a valid case to properly assess the smaller sites around Bath, including Bathampton, for their release for much needed housing. The Inspector has raised the question of how further Green Belt releases may be achieved following adoption of the Core Strategy and it is clear that a recognised and clearly expressed process should be set in place if housing need and sustainability objectives are to be met.

The LPA raises the suggestion that it would be difficult to release Green Belt after adoption of the Core Strategy given the need to show exceptional circumstances and to maintain it long term but that is not the advice of the NPPF. It is clear in the NPPF that LPAs should be plan-making for the full objectively assessed needs of their area and that there will be circumstances where the Green Belt must be amended to accommodate these. Bath is a clear example and, until the LPA is confident that it has planned for all of its development needs and made provision for the longer term, the Green Belt boundary should not be considered established or fixed in NPPF terms (paras 83-85).

The LPA's response to the Inspector's questions in BNES/47 presents 3 options for accommodating a further interrogation of small sites and associated Green Belt release and the Inspector will determine if one or any of these is an appropriate way forward. The main question which arises from these options, however, is that of timing and the ability of these processes to facilitate the provision of new housing in a timely manner rather than leaving it to be deferred or delayed via further policy production. As it stands, there appears to be no programme presented for any of the LPA's options.

**In conclusion**

My clients wish to have their land at Bathampton reconsidered as a housing allocation and can confirm that it is deliverable within the NPPF definition. Whilst recognising that this representation is not a direct comment on the proposed Green Belt amendments, it is a related matter which must be taken into account when considering the need for and extent of other strategic land releases in the Green Belt. I attach an email from Richard Walker of BANES Planning of 9th Nov 2013 advising of the acceptability of submitting a further site but would note that this site is not new to the Core Strategy process, it having already been considered in the SHLAA.

To this end, my clients seek the realignment of the Green Belt boundary to achieve the site's release from the designation so as to allow development to be brought forward.

I assume that the Inspector will evaluate the LPA's suggestions in BNES/47 paras 6.7 - 6.12 and recommend the most appropriate way forward to allow the proper investigation of the potential of smaller sites but would ask that there be a timetable applied to allow the process to proceed promptly and facilitate housing delivery.

**Change to the policy requested:**

[The above comment was submitted in the form of a petition which was signed by 1,305 signatories – see Appendix 2 for list of signatories plus supplementary comments made]



# **Appendix 1 – No New Homes in Green Belt Email**



**COMMENTS**

To: Bath & North East Somerset Council – Core Strategy

CC: Secretary of State – Eric Pickles, Jacob Rees Mogg MP, Don Foster MP

I write in response to the current public consultation that ends on 20th December.

I am in OPPOSITION and have deep concerns over Bath and North East Somerset Council's (BANES) plans to develop on the Green Belt.

I do not believe BANES has adequately explored all alternatives to building on the Green Belt.

Developing the Green Belt should be the final option and only in exceptional circumstances, which, in this case, do not exist.

I am dismayed that BANES is intending to deliver more houses than are actually required.

This over provision is expected to be achieved by building on the Green Belt, whereas the Green Belt should remain protected.

BANES should:

\* Obtain a higher percentage of affordable housing from property developers.

Just pushing that percentage up very slightly means no Green Belt would need to be built on.

\* Use all available Brownfield land before releasing Green Belt land which could also provide a higher percentage of affordable housing.

\* Release some of BANES' own land for affordable housing.

\* Increase housing density on non Green Belt sites.

\* Encourage the use of and facilitating the conversion of the large number of empty flats that exist above shops in Bath for affordable housing.

\* Approach neighbouring commuter towns to see what availability they have and undertake a greater duty to co-operate.

\* Protect the Green Belt and recognise the importance of the Green Belt to the World Heritage Site.

Please confirm you will withdraw and revise the plans to release Green Belt land for development and ensure these special areas remain undeveloped for the benefit of future generations.

BANES can achieve its housing needs without releasing Green Belt land.

Thank you.

Yours faithfully,

**Email sent by the following respondents:**

#	Respondent No.	First Name	Surname
1	324	Alex	Martin
2	2583	Roy	Williams
3	2666	Roger	Houghton
4	2917	Steve	Henwood
5	2951	Anthony	Howard
6	2966	Nigel	Dann
7	4468	Daniel	Barnett
8	4477	Robert	Parfitt
9	4478	Betty	Marsland-Bulley
10	4487	&rew	Hoyes
11	4498	Colin	Robinson
12	4500	John	Dunn
13	4502	James & Penny	Townsend
14	4527	Peter	Bennett
15	4531	Susan	Phillips
16	4542	Rachel	Foster
17	4546	June	Thomas
18	4552	Mark & Joy	Lacey
19	4557	Martin	Deen
20	4585	C W	Stammers
21	4591	Marie	Weinel
22	4615	Gerard	Cheshire
23	4617	Joel	Hirst
24	4626	Neil	Butters
25	4631	Chris	Sandison
26	4648	Elizabeth	Bloor
27	4653	Mary	Wynne-Griffiths
28	4671	Colin	Webb
29	4682	David	Webster
30	4723	Robert Black & Jacquie	Murray
31	4935	Darryl	Sibson
32	4943	Stefan	Perkins
33	4963	Brian	Clark
34	5025	Alan	Bond
35	5105	Samantha	Purrier
36	5115	Mary	Roberts
37	5174	Rachel	Jarai
38	5942	Bev	Gannon
39	5943	Sonia	Willis
40	5944	Corine	Jakomin
41	5945	Olivia	Hill
42	5946	Angela	Humphries
43	5947	Sam	Harrison
44	5948	Steve	Gray
45	5949	Lynne	Bellacomo
46	5950	Paul	Wilby
47	5951	Mattie	Edge

#	Respondent No.	First Name	Surname
48	5952	Claire	Riou
49	5953	Michael	Edge
50	5954	Robert	Black
51	5955	Julie	Stenning
52	5956	Charlotte	Obolensky
53	5957	Richard	Vowles
54	5958	Elysabeth	McCaig-Scott
55	5959	Sophie	Newman
56	5960	Alison	
57	5961	Louise	Priestman
58	5963	Ruth	Wishart
59	5964	Kate	Jefferson
60	5965	Christine	Downton
61	5966	Barry	Hall
62	5967	Helena	Jaeschke
63	5968	Adrian	Stenning
64	5969	Rosie	Morgan
65	5970	Dale	Van Steinburg
66	5971	Alan	Bowman
67	5972	Alison	Vowles
68	5973	Glen	Stewart
69	5974	Stewart	Cann
70	5975	Jan	Rippon
71	5976	John	Bulman
72	5977	Paul	De'Ath
73	5978	Stephen	Saunders
74	5979	Dave	Mason
75	5980	Sharon	
76	5982	Sarah	Ormes
77	5983	Hannah	Watson
78	5984	Sarah	Asprey
79	5985	P	Cray
80	5986	D	Cray
81	5987	Tony	Nevill
82	5988	Jaki	Williams
83	5989	Sarah	Knight
84	5990	Sally	Bowman
85	5991	Hannah	Sime
86	5992	Nick	Evans
87	5993	Emma	Russell
88	5994	Liz	Thomas
89	5995	Rachel	Perry
90	5996	Ruth	Corbett
91	5997	Shirley	Allen
92	5998	Melanie	Da Costa
93	5999	Cressida	Lyon
94	6000	Sophie	Buften
95	6001	Ewan	Robertson

#	Respondent No.	First Name	Surname
96	6002	Joanna	Osborne
97	6003	Mike	Service
98	6004	Sacha	Hunter
99	6005	Julian	Vincent
100	6006	Sally	Muir
101	6007	B	Griffiths
102	6008	Claire	Dustin
103	6009	Mark	Dustin
104	6010	Bryan	Williams
105	6011	Neil	Garrett
106	6012	Stuart	Bridge
107	6013	Peter	Breese
108	6014	James	Binns
109	6015	Judy	Lloyd
110	6016	Anca	
111	6017	Joanna	Taylor
112	6018	Nicola	Hall
113	6019	Ann	Quayle
114	6020	Sachiko	Barry
115	6021	Rob	Oldfield
116	6022	Aileen	Oldfield
117	6023	Michael	Rowe
118	6024	Midge	Ure
119	6025	William	Williamson
120	6026	J	Perryman
121	6027	Janet	Plater
122	6028	Daryl	Pike
123	6029	Rob	Rawlings
124	6030	Angela	Roberts
125	6031	Claire	Margetts
126	6032	Philip	Hawthorn
127	6033	Daysheen	Bhogal
128	6034	Harkiran	Bhogal
129	6035	harbinder	Bhogal
130	6036	David	Newman
131	6037	Hazel	Newman
132	6038	Fransesca	de Monterey
133	6039	Sarah	Bond
134	6040	Rhydian	Williams
135	6041	Dawn	Reid
136	6042	Stephany	Bardzil
137	6043	Huw	Williams
138	6044	Jeff	Williams
139	6045	Geoff	Williams
140	6046	Clare	Williams
141	6047	David	Weinel
142	6048	Jennifer	Weinel
143	6049	Suzanne	Kerr

#	Respondent No.	First Name	Surname
144	6050	B	Bishop
145	6051	Lisa	Jackson
146	6052	J	Long
147	6053	Tam	Rundle
148	6054	Barbara	Jamieson
149	6055	Sonia	Mainstone-cotton
150	6056	Rupert	Douglas
151	6057	Kathy	Pflaum
152	6058	Alan	Batcheldor
153	6059	EDM	Floyd
154	6060	Jessica	Pike
155	6061	Judith	Hible
156	6062	Helen	Rogers
157	6063	Jolyon	Charley
158	6064	Nicky	Higby
159	6065	Nicolas	Riou
160	6066	Terence	Corkin
161	6067	Sam	Priestman
162	6068	Jan	Dickinson
163	6069	Diana	Prescott
164	6070	Tracy	Adlington
165	6071	Josh	Scott
166	6072	John	Norwich
167	6073	Angela	Dudley
168	6074	Anna	Robertson
169	6075	Kevan	Chaston
170	6076	Daniel	McNaught
171	6077	Terry	Bedding
172	6078	Alison	Swift
173	6079	Lloyd	Randall
174	6080	Diana	Lanham
175	6081	Michael & Della	Fathers
176	6082	E	Moxham
177	6083	Harry	Shannon
178	6084	Val	Mead
179	6085	John	Power
180	6086	Margaret	White
181	6087		Hooton
182	6088	Alistair	Bradley
183	6089	Stephanie	Kynaston
184	6090	&rew	Proudman
185	6091	Mark	Padfield
186	6092	Ed	Silvester
187	6093	Rob	McGowan
188	6094	Alex	Silvester
189	6095	Angela	Galpin
190	6096	Toni	Rhoden

#	Respondent No.	First Name	Surname
191	6097	Graeme	Baker Smith
192	6098	Linda	Baker Smith
193	6099	Marcus	Coyle
194	6100	A	Brown
195	6101	Sean	Smith
196	6102	Phil	Turton
197	6103	Edward	Gifford
198	6104	Hannah	Sullivan
199	6105	Hazel	Corradi
200	6106	Mary	Wilde
201	6107	Sam	Jones
202	6108	Alex	Jones
203	6109	Steve	Jones
204	6110	Carol	Jones
205	6111	Teresa	Stephenson
206	6112	Tadeo	Corradi
207	6113	Helen	Rugg
208	6114	Brenda	Trotter
209	6115	Leigh & Alan	Book
210	6116	Mary	Daniel
211	6117	Wendy	Kellett
212	6118	Guy	Hansford
213	6119	Colin	Smith
214	6120	Erica	Smith
215	6121	Natalie	Paddick
216	6122	Joshua	Lacey
217	6123	Jessica Rose	Seckington
218	6124	R	Anderson
219	6125	Michael & Grace	Browne
220	6126	Colin	Lacey
221	6127	Chris	McGrail
222	6128	Alick	Bartholomew
223	6129	Sarah	Cheshire
224	6130	M	Trewavas
225	6131	Laura	Stolper
226	6132	Bernard	Woodford
227	6133	Rick	Halle
228	6134	Vivienne	Pozo
229	6135	Caroline	Francis-King
230	6136	Frank	Scott-Tomlin
231	6137	Anna	Godfrey
232	6138	Nicky	Hayward
233	6139	Simon	Johnson
234	6140	Jean	Melksham
235	6141	Rachel	Morton
236	6142	Lucy	Harding
237	6143	Pat	Solomon
238	6144	Sarah	Prendegast

#	Respondent No.	First Name	Surname
239	6145	Ray	Shepherd
240	6146	Michelle	Wontner
241	6147	Gill	Moir
242	6148	Margaret	Stephenson-White
243	6149	Linda	Perry
244	6150	Blanca	Garcia-Puente
245	6151	Joseph Louis	Pozo
246	6152	Michael & Gwyneth	Dean
247	6153	Jon	Buck
248	6154	Elizabeth	Gale
249	6155	Helen	Tremelling
250	6156	Alison	Gitens
251	6157	Charles	Kerr
252	6158	Susan	Coles
253	6159	Mark	Fisher
254	6160	Nancy	Coppock
255	6161	Caroline	Kington
256	6162	Ben	Gale
257	6163	Camilla	Greenslade
258	6164	Pascale	Souchon
259	6165	Algy	Sloane
260	6166	Steve	Slack
261	6167	Gareth	Evans
262	6168	Anthony	Anderson
263	6169	Janet	Anderson
264	6170	Maxine	Budden
265	6171	Victoria	Finlay
266	6172	Gail	Mills
267	6173	Nigel	Mills
268	6174	Michelle	Parsons
269	6175	Robert	Paul
270	6176	John	Eddison
271	6177	Sue	Ayles
272	6178	Jacqueline	Burrows
273	6179	Paul	Jackson
274	6180	Ray	Bearman
275	6181	Alistair	Keith
276	6182	Sheila	Gammon
277	6183	Charlotte	Bayntun-Coward
278	6184	Paul	Lawrence
279	6186	Alan	Bennett-Brown
280	6187	Karl	Tall
281	6188	Sarah	Hartigan
282	6189	Frank	Wagstaff
283	6190	Tom	Jones
284	6191	Alice	Harper
285	6192	Cyril	Ralph

#	Respondent No.	First Name	Surname
286	6193	Sarah	Studd
287	6194	Roger	Symonds
288	6195	Sue	Wilford
289	6196	Chris	Cook
290	6197	Jane	Eddison
291	6198	Dianne	Whetter
292	6199	Sheilagh	Humphreys
293	6200	Richard	Holland
294	6201	Jane	Riley
295	6202	Martin	Palmer
296	6203	Malcolm	Kirkham
297	6204	Victoria	Ely
298	6205	Sue	Wales
299	6206	Judith	Liddell
300	6207	Mary Jane	Evans
301	6208	Maureen	Freely
302	6209	Rhydian	Williams
303	6210	Jane	Harris
304	6211	Paul	Hannaford
305	6212	Sophia	Love
306	6213	Sally	Garner
307	6214	Angela	Nutbrown
308	6215	Richard	Hood
309	6216	Helen	Gammon
310	6217	Janet	Rolls
311	6218	Jamie	Muir
312	6219	Caroline	Muir
313	6220	Lesley	Bailey
314	6221	Nick	Moyle
315	6222	Peter	Myers
316	6223	Sarah	Layzell
317	6224	Stephen	Beardshaw
318	6225	Nigel	Long
319	6226	Lynda	Le Ray
320	6227	Annie	De Grey
321	6228	Laura	Hoyano
322	6229	Teresa	Llewellyn
323	6230	Simon	Denning
324	6231	Nick	Obolensky
325	6232	Pamela	Webb
326	6233	Karen	Patmore
327	6234	Michael	Ayles
328	6235	R	Mottram
329	6236	Sarah	Sell
330	6237	John	Marsden
331	6238	Geoffrey	Wheatcroft
332	6239	Charlotte	de Grey
333	6240	Margaret	Webster

#	Respondent No.	First Name	Surname
334	6241	I	Hare
335	6242	Sheila	Astley
336	6243	Alison	Scott
337	6244	J	Binns
338	6245	Philippe	Apchin
339	6246	Nick	Hawkins
340	6247	Christina	Rockett
341	6248	Brian	Parkins
342	6249	John	Holdaway
343	6250	Hywel	Thomas
344	6251	Angela	Edwards
345	6252	Howard	Edwards
346	6253	Richard	Saker
347	6254	Stefan	Miles
348	6255	Allan	Phillips
349	6256	Simon	Llewellyn
350	6257	Linda	Gosling
351	6258	Sue	Saker
352	6259	Adrian	Tinniswood
353	6260	Neil	Garrett
354	6261	Sophy	Bayntun-Coward
355	6262	Jonathan	Bayntun-Coward
356	6263	Jane	Weller
357	6264	Chris	Wordsworth
358	6265	Ian	Girvan
359	6266	Christopher	Dagger
360	6267	Margaret	Dagger
361	6268	P	Adams
362	6269	David	Harrison
363	6270	M	Adams
364	6271	Simon	Calvert-Jones
365	6272	Katie	Harrison
366	6273	Ashley	Pharoah
367	6274	Pamela	Gates
368	6275	Philip	Harrison
369	6276	Mary	Cooke
370	6277	Paul	Oaten
371	6278	Trudy	Harrison
372	6279	Stuart	Seale
373	6280	Francesca	Parsons
374	6281	Stuart	Hannis
375	6282	Edward	Jenkins
376	6283	Michael	de Grey
377	6284	Shan	Parfitt
378	6285	Tom	Rogers
379	6286	Sue	Wagstaff
380	6287	Mark	Mackintosh
381	6288	Paul	Burnett

#	Respondent No.	First Name	Surname
382	6289	Jon	Bennett
383	6290	M	Oldfield
384	6291	Catherine	Oldfield
385	6292	Mary	Gillmore
386	6293	Viccie	Palmer
387	6294	S	Byfield
388	6295	Ann	Cowan
389	6296	Alastair	Cowan
390	6297	Alison	Murray

# **Appendix 2 – Protect South Stoke Plateau Petition**



# **PETITION**

**PROTECT  
SOUTH STOKE  
PLATEAU FROM  
300 NEW HOMES**

**PRESENTED TO FULL COUNCIL  
14/11/2013**

**1,305 SIGNATURES,  
PLUS COMMENTS**

Recipient: Rt Hon Eric Pickles MP, Jacob Rees-Mogg, and Rt Hon Don Foster MP

Letter: Greetings,

We the undersigned, ask you to recognise the importance of the South Stoke plateau on the edge of the UNESCO World Heritage Site of Bath - not only designated Cotswold AONB and Green Belt, but also the site of the Wansdyke Scheduled Ancient Monument and habitat for endangered Greater Horseshoe Bats and Skylarks.

We are not NIMBYs and we recognise the need for more housing. However, we believe all brownfield sites within Bath should be exhausted and exploited (ie maximum density) before Green Belt is considered.

Please ensure that the lush landscape of the South Stoke plateau, which is important to the unique setting of our beautiful city, remains available for the people of Bath to enjoy for generations to come.

Recipient: Rt Hon Eric Pickles MP, Jacob Rees-Mogg, and Rt Hon Don Foster MP

Letter: Greetings,

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We are not NIMBYs and we recognise the need for more housing. However, we believe all brownfield sites within Bath should be exhausted and exploited (ie maximum density) before Green Belt is considered.

Please ensure that the lush landscape of the South Stoke plateau, which is important to the unique setting of our beautiful city, remains available for the people of Bath to enjoy for generations to come.

# Signatures

<b>Name</b>	<b>Location</b>	<b>Date</b>
Colin Robinson	Bath, Eng, United Kingdom	2013-06-02
julia Beardshaw	Bath,	2013-06-02
Colin Webb	Bath, Eng, United Kingdom	2013-06-03
Gareth Herincx	Bath,	2013-06-03
Roz Jones	Bath,	2013-06-03
Susan Willis	Bath, Eng, United Kingdom	2013-06-03
Michael Swift	Bath, Eng, United Kingdom	2013-06-03
David Babb	Bath, Eng, United Kingdom	2013-06-03
Gerard Cheshire	Bath, Eng, United Kingdom	2013-06-03
Amelia Christmas	London, United Kingdom	2013-06-03
Snjolaug Swift	Bath BA2 5SN,	2013-06-03
John Dunn	Bath, United Kingdom	2013-06-03
Pamela Webb	Bath, Eng, United Kingdom	2013-06-03
Abigail Purdey	Auckland, New Zealand	2013-06-03
Nicola Parry	Bath, Eng, United Kingdom	2013-06-03
Debbie Bensley	Bath, Eng, United Kingdom	2013-06-03
Tamsin Miller	Bath, United Kingdom	2013-06-03
Nicola Freeman	Bath, , United Kingdom	2013-06-03
kate keen	Bath, Eng, United Kingdom	2013-06-03
Josh Freeman	Bath, Eng, United Kingdom	2013-06-03
Christine Stammers	Bath,	2013-06-03
Peter Bennett	Bath, UK,	2013-06-03
Gareth Evans	Bath, Eng, United Kingdom	2013-06-03
Janet Robinson	Bath,	2013-06-03
Brenda Hilliard	Bath, Eng, United Kingdom	2013-06-04
Charles Stammers	Bath, Eng, United Kingdom	2013-06-04
Brian Bowles	London, , United Kingdom	2013-06-04
David Rushgrove	Bath,	2013-06-04
Philip Raby	Bath, Eng, United Kingdom	2013-06-04
Penny Townsend	Bath,	2013-06-04

<b>Name</b>	<b>Location</b>	<b>Date</b>
Gary Forrest	Bath, Eng, United Kingdom	2013-06-04
Katie Husband	Fareham, , United Kingdom	2013-06-04
Alexander Dale-Staples	Bath, Eng, United Kingdom	2013-06-04
Paul Morgan	Bath, Eng, United Kingdom	2013-06-04
Ann Ruthven	Bath,	2013-06-04
Robin Ward	London,	2013-06-04
Philippe Apchin	Bath, United Kingdom	2013-06-04
Pam Piekema	Bath, Eng, United Kingdom	2013-06-04
Nic Bottomley	Bath,	2013-06-04
Mark van den Akker	Bath, Eng, United Kingdom	2013-06-04
Hanneke Veenman	The Hague, Netherlands	2013-06-04
Suze Pole	Bristol,	2013-06-04
Beatrice Hutchison	Bath, Eng, United Kingdom	2013-06-04
Teresa Perrett	Bath, Eng, United Kingdom	2013-06-04
caroline Cundy	Bath,	2013-06-04
Rebecca Collett	Bath, Eng, United Kingdom	2013-06-04
peter Breese	bath,	2013-06-04
Ben Rushgrove	Bath, Eng, United Kingdom	2013-06-04
Andrea Parkes	Bath, Eng, United Kingdom	2013-06-04
Sian Swift	Bath, United Kingdom	2013-06-04
Richard Briggs	Bath, Eng, United Kingdom	2013-06-04
Tom Johnson	Bath, Eng, United Kingdom	2013-06-04
Katy Taylor	London, , United Kingdom	2013-06-04
Simon Bensley	Bath, United Kingdom	2013-06-04
Margaret Stroud	Bath, Eng, United Kingdom	2013-06-04
Ruth White	Bath,	2013-06-04
kate hayle	aylesbury, United Kingdom	2013-06-04
vicky pitcher	norwich, United Kingdom	2013-06-04
Annie Lomas	Tonypandy, , United Kingdom	2013-06-04
Emily Lake	London,	2013-06-04
sally muir	Bath, , United Kingdom	2013-06-04

<b>Name</b>	<b>Location</b>	<b>Date</b>
Jane Yates	This city and it's surroundings are precious and unique, we must try and pr,	2013-06-04
Angela Frith	Bath,	2013-06-04
Machaela Parkin	Hinton Charterhouse, United Kingdom	2013-06-04
Mark Bradley	Aylesbury, Eng, United Kingdom	2013-06-04
Geoffrey Wheatcroft	Bath, Eng, United Kingdom	2013-06-04
Penny Hill	Bath, Eng, United Kingdom	2013-06-04
Rachel Hickman	Bath, Eng, United Kingdom	2013-06-04
Anita Bye	Bath,	2013-06-04
Keith woodley	Bath, Eng, United Kingdom	2013-06-04
Carolyn Sherwood-Dawson	Weston-super-Mare, Eng, United Kingdom	2013-06-05
Carol Lang	Toronto, Canada	2013-06-05
Sarah Lloyd	Australia	2013-06-05
Jacob Heatley-Adams	Freshford, United Kingdom	2013-06-05
Victoria Walters	Bath, United Kingdom	2013-06-05
James Walters	Bath, United Kingdom	2013-06-05
Stan Frith	Bath, Eng, United Kingdom	2013-06-05
chris dawson	bath,	2013-06-05
David Costa	Bath BA9 8AX,	2013-06-05
John Calvert-Jones	Bath,	2013-06-05
Emily Rushgrove	Bath,	2013-06-05
Kate McDonnell	Bath,	2013-06-05
Sue Mercer	Bath,	2013-06-05
Susan Sherwood	Bath, Eng, United Kingdom	2013-06-05
harriet joynes	New York, NY, United States	2013-06-05
Jim Edmiston	Bath,	2013-06-05
Virginia Crawford	Bath, Eng, United Kingdom	2013-06-05
Jill Pizey	Bath,	2013-06-05
Imogen Freeman	Bath, United Kingdom	2013-06-05
Andrew Vowles	Bath, Eng, United Kingdom	2013-06-05
Simon Nicholson	Norwich, Eng, United Kingdom	2013-06-05
Fiona Gourley	Bath, Eng, United Kingdom	2013-06-05

<b>Name</b>	<b>Location</b>	<b>Date</b>
Katharine Smith	Shepton Mallet, , United Kingdom	2013-06-05
Gail Wilkinson	Bath, United Kingdom	2013-06-05
Jennifer John	Bath, Eng, United Kingdom	2013-06-05
Daniel Crawford	Norwich, Eng, United Kingdom	2013-06-05
Gillie Atkins	Bath, United Kingdom	2013-06-05
Paul Terry	Nottingham, United Kingdom	2013-06-05
John Asbridge	Bognor, United Kingdom	2013-06-05
Michele Peck	Auckland, New Zealand	2013-06-06
Susie Hood	Bath, United Kingdom	2013-06-06
Pam Pendleton	Blidworth, United Kingdom	2013-06-06
Sarah Fisher	Bristol, , United Kingdom	2013-06-06
john johnston	Radstock,	2013-06-06
Tim Pizey	Oxford,	2013-06-06
Susie Mulvany	Holt, United Kingdom	2013-06-06
Penny Mallitte	Newton Saint Loe, United Kingdom	2013-06-06
Claudia Webb	Bath, United Kingdom	2013-06-07
Joanna McNaught	Bath, Eng, United Kingdom	2013-06-07
Helen Geake	Bury St Edmunds, , United Kingdom	2013-06-07
Simon Pizey	London,	2013-06-07
Andrew Fletcher	Worcester,	2013-06-07
Sam Smith	Portsmouth, , United Kingdom	2013-06-07
Hedvika Skalova	Cardiff, , United Kingdom	2013-06-07
nicola macdonald	essex, , United Kingdom	2013-06-07
Janet Hackney	Hyde, Eng, United Kingdom	2013-06-07
Heather Boyce	Falkirk,	2013-06-07
Jessica Hamilton	London, , United Kingdom	2013-06-07
Karen Naylor	Isle of Wight, , United Kingdom	2013-06-07
Marie Francis	Leeds, , United Kingdom	2013-06-07
Andrew Kruyer	Peterborough, , United Kingdom	2013-06-07
karen caldbeck	Milton Keynes, Eng, United Kingdom	2013-06-07
maria lima	Ionsdon, , United Kingdom	2013-06-07
MARINA MURPHY	Barrow-in-Furness, Eng, United Kingdom	2013-06-07

<b>Name</b>	<b>Location</b>	<b>Date</b>
Lucy Ross	Edinburgh,	2013-06-07
Jill Rickard	Poole,	2013-06-07
john hurlstone	Aylesbury, England, United Kingdom,	2013-06-07
Jenny Glover	London, , United Kingdom	2013-06-07
jean german	dyffryn ardudwy, , United Kingdom	2013-06-07
Jennifer Johnson	Andover,	2013-06-07
sharon bayram	sancton,	2013-06-07
heather miller	Neath, Wal, United Kingdom	2013-06-07
cherie trounce	dorset, , United Kingdom	2013-06-07
Elizabeth O'Halloran	Kettering, , United Kingdom	2013-06-07
Amy Hughes	Winchester, , United Kingdom	2013-06-07
sara williams	telford,	2013-06-07
Roy Scott	Oswestry, , United Kingdom	2013-06-07
david hind	Durham, Eng, United Kingdom	2013-06-07
Rebecca Meredith	Swansea, , United Kingdom	2013-06-07
Jennifer Beattie	Glasgow, Sco, United Kingdom	2013-06-07
Helen Chave	Wales, , United Kingdom	2013-06-07
Angela Courtney	Leeds, , United Kingdom	2013-06-07
joanne belasco	Weymouth, England, United Kingdom,	2013-06-07
Terry Brough	Saint Helens, Eng, United Kingdom	2013-06-07
julie rush	Newcastle upon Tyne, Eng, United Kingdom	2013-06-07
Thomas Hale	London, , United Kingdom	2013-06-07
Jane Hamilton	Bexhill on Sea,	2013-06-07
Linda Steers	Milton Keynes, , United Kingdom	2013-06-07
Lucy Johns	Southampton,	2013-06-07
Peter Burt-Jones	London, , United Kingdom	2013-06-07
Shane Edwards	Hinckley, , United Kingdom	2013-06-07
C Thornton	Monifieth, , United Kingdom	2013-06-07
Andrea Fabiana Mitidieri	Edimburgo, Esc, United Kingdom	2013-06-07
Carole Barbieri	Bristol, Eng, United Kingdom	2013-06-07
Roger Dorrell	Birmingham, Eng, United Kingdom	2013-06-07
Sarah Cheshire	Bath,	2013-06-07

<b>Name</b>	<b>Location</b>	<b>Date</b>
terry sanger	Wales, , United Kingdom	2013-06-07
Lauren Malley	London,	2013-06-07
frank cammock	belfast,	2013-06-07
Vera Kellock	Potters Bar, , United Kingdom	2013-06-07
Sonya Armenia Hunter	Hull, , United Kingdom	2013-06-07
janet Audley Charles	St. Albans, , United Kingdom	2013-06-07
A P	London, , United Kingdom	2013-06-07
Janice Goodacre	London, , United Kingdom	2013-06-07
elaine huelin	Didcot, Eng, United Kingdom	2013-06-07
Karen Harper	Basingstoke, , United Kingdom	2013-06-07
Susan Jones	Cardigan Pembrokeshire,	2013-06-07
Amirali Ravji	Peterborough.cams., , United Kingdom	2013-06-07
martin Stanford	Cambridge, Eng, United Kingdom	2013-06-07
rhys allen	Doncaster, Eng, United Kingdom	2013-06-07
Gail Anthony	Derby, , United Kingdom	2013-06-07
Rita Bannon	Manchester, Eng, United Kingdom	2013-06-07
angelo christou	London, , United Kingdom	2013-06-07
simon sheehy Sleaford	Sleaford, , United Kingdom	2013-06-07
Jude Towers	Lancaster, Eng, United Kingdom	2013-06-07
Cathy Rosa	Carnoustie, , United Kingdom	2013-06-07
Alan Daniels	Doncaster, , United Kingdom	2013-06-07
chrissie hall	derby,	2013-06-07
Silvia Muñoz	Londres, , United Kingdom	2013-06-07
michelle brown	lancaster, , United Kingdom	2013-06-07
thomas henderson	sunderland,	2013-06-07
sally harris	London, , United Kingdom	2013-06-07
Sally Ansell	United Kindom,	2013-06-07
sven hanson	Brighton, Eng, United Kingdom	2013-06-07
Andrew Stevenson	Matlock, , United Kingdom	2013-06-07
Paul Juhasz	London, , United Kingdom	2013-06-07
A Keyne	London, , United Kingdom	2013-06-07
George Adagwendo	London, , United Kingdom	2013-06-07

<b>Name</b>	<b>Location</b>	<b>Date</b>
kristina renschaw	Wales, , United Kingdom	2013-06-07
Gordon and Julie Campbell	Bath, United Kingdom	2013-06-07
Daniel McNaught	Bath,	2013-06-07
jennifer bravery	westbury, , United Kingdom	2013-06-07
Alexandra Quinn	Glasgow, , United Kingdom	2013-06-07
Celia Stewart	Bath, Eng, United Kingdom	2013-06-07
Barbara Ann Barrett	Oxford,	2013-06-07
LEIGH FARR	LONDON ENGLAND, , United Kingdom	2013-06-07
Matthew Bartey	Bradford, , United Kingdom	2013-06-07
elaine lawrence	lewes,	2013-06-07
Shirley Livingstone	Taynuilt, Sco, United Kingdom	2013-06-07
Sue Besford	Durham,	2013-06-07
B Griffiths	Cwmdu, Wal, United Kingdom	2013-06-07
steve goldsack	glasgow, , United Kingdom	2013-06-07
Helen k	london, , United Kingdom	2013-06-07
hayley holmes	France	2013-06-07
harbinder bhogal	London, , United Kingdom	2013-06-07
Marian Small	London, United Kingdom	2013-06-07
Georgia Waterton	Redhill, , United Kingdom	2013-06-07
carla morgan	Colchester, Eng, United Kingdom	2013-06-07
Jennifer Jones	Exeter, Eng, United Kingdom	2013-06-07
Kamila Tuczynska	Leeds, , United Kingdom	2013-06-07
Philipa Bassett	Cardiff, , United Kingdom	2013-06-07
Laura Liddell	Norwich, , United Kingdom	2013-06-07
Tommy Frampton	Bromley, , United Kingdom	2013-06-07
Jean Carroll	London, , United Kingdom	2013-06-07
Netta Rowlands	Mold,	2013-06-07
Barry Walker	Plymouth, England, United Kingdom,	2013-06-07
Paula Lloyd	Burton on Trent, , United Kingdom	2013-06-07
Sarah Johnson	Hildenborough,	2013-06-07
amanda skeggs	Brixham, , United Kingdom	2013-06-07
david o'brien	bristol,	2013-06-07

<b>Name</b>	<b>Location</b>	<b>Date</b>
Stuart Cullimore	Camborne,, , United Kingdom	2013-06-07
Susan Reoch	Hounslow, , United Kingdom	2013-06-07
Aikaterini Panagiotopoulou	London, , United Kingdom	2013-06-07
Graf katharina.graf@gmx.net	Coventry, Eng, United Kingdom	2013-06-07
alan robson	, United Kingdom	2013-06-07
Dale Westwood	Telford. Shropshire, , United Kingdom	2013-06-07
E Cadman	Norwich, , United Kingdom	2013-06-07
vicki fowkes	wolverhampton, , United Kingdom	2013-06-07
Lana Mankos	London,	2013-06-07
Sadie Dempsey	Dukinfield, Eng, United Kingdom	2013-06-07
Margaret Woodall	Necton, , United Kingdom	2013-06-07
Gillian Young	Ross-Shire, , United Kingdom	2013-06-07
jo smith	beds, , United Kingdom	2013-06-07
Jamila Bibi	West Yorkshire,	2013-06-07
Pauline Smith	Bristol, Eng, United Kingdom	2013-06-07
mary waldron	reading,	2013-06-07
chris burford	christchurch, , United Kingdom	2013-06-07
angela gronow	bridgend, , United Kingdom	2013-06-08
Genni Pavone	Swindon, Eng, United Kingdom	2013-06-08
Susan Berry	Bolton, , United Kingdom	2013-06-08
Andrew Fortnum	market harborough, , United Kingdom	2013-06-08
Evony-Lenice Brooks	Birmingham, , United Kingdom	2013-06-08
Georgia Winwright	London, , United Kingdom	2013-06-08
Debz Jones	Cambridge, , United Kingdom	2013-06-08
munir hussain	Dewsbury, Eng, United Kingdom	2013-06-08
Christina Hatton	Widnes, Eng, United Kingdom	2013-06-08
DAVID DUNCAN	Spain	2013-06-08
Colin Bell	Farnborough, Eng, United Kingdom	2013-06-08
George Stevenson	Glasgow, , United Kingdom	2013-06-08
Quoc Anh Nguyen	London,	2013-06-08
Alan Doughty	United Kingdom	2013-06-08
Michael Stephens	Bristol , United Kingdom	2013-06-08

<b>Name</b>	<b>Location</b>	<b>Date</b>
fiona Thriepland	Dalton-in-Furness, , United Kingdom	2013-06-08
Marlies Hyman	Glasgow, , United Kingdom	2013-06-08
Monique Buckner	Cassington, , United Kingdom	2013-06-08
David Stuart	Bath, United Kingdom	2013-06-08
David Green	Preston, , United Kingdom	2013-06-08
Patricia Wynne	Llandudno, , United Kingdom	2013-06-08
pat sykes	stroud,	2013-06-08
DEREK BETTS	GRANTHAM,	2013-06-08
Roger Marsh	Chipping Norton, Eng, United Kingdom	2013-06-08
HUW JONES	CLACTON ON SEA, , United Kingdom	2013-06-08
Sarah Irving	Manchester, , United Kingdom	2013-06-08
Darren Woolsey	Bradford, , United Kingdom	2013-06-08
pawel suchocki	Northampton, Eng, United Kingdom	2013-06-08
Suzanne Stevens	Liverpool, , United Kingdom	2013-06-08
Pete Crane	Southampton, , United Kingdom	2013-06-08
phil panton	aberystwyth, , United Kingdom	2013-06-08
Michelle Hayward	Kempston, , United Kingdom	2013-06-08
Lesley Benzie	Glasgow, , United Kingdom	2013-06-08
Michelle Daws	Stafford,	2013-06-08
Ellen O'Brien	LONDON, , United Kingdom	2013-06-08
marcel garbi	London, , United Kingdom	2013-06-08
Jasmine Pacey	Radstock, United Kingdom	2013-06-08
Annie Nafieva	London, , United Kingdom	2013-06-08
Barbara Johnson	London,	2013-06-08
Paul Jennings	Mansfield, , United Kingdom	2013-06-08
Anne Pengelly	Leicester,	2013-06-08
liz sanchez	London, , United Kingdom	2013-06-08
Susan Morris	London, , United Kingdom	2013-06-08
Sharon Holland	East Sussex, , United Kingdom	2013-06-08
f akel	Gloucester, , United Kingdom	2013-06-08
PRAGNA DESAI	WATFORD,	2013-06-08
michelle kirkman	manchester, , United Kingdom	2013-06-08

<b>Name</b>	<b>Location</b>	<b>Date</b>
ulrike clarke	thorndon uk, , United Kingdom	2013-06-08
Phil Marshall	Sutcombe, Eng, United Kingdom	2013-06-08
Carole Hughes	Manchester, , United Kingdom	2013-06-08
Richard Marsh	Bath,	2013-06-08
sandra murray	Wakefield, Eng, United Kingdom	2013-06-08
Susannah Peel	St Andrews, , United Kingdom	2013-06-08
mary ocarroll	Liverpool, Eng, United Kingdom	2013-06-08
janine hemsley	hastings, , United Kingdom	2013-06-08
mark Bastian	Helston, , United Kingdom	2013-06-08
David Rusinas	Halifax, , United Kingdom	2013-06-08
helen taverner	newcastle upon tyne, , United Kingdom	2013-06-08
Jonathan Knowles	Blackpool, , United Kingdom	2013-06-08
Kathleen Harrison	Loughborough, , United Kingdom	2013-06-08
Richard Earl	Sandy, , United Kingdom	2013-06-08
Waseem Riaz	Dewsbury,	2013-06-08
Mel Letham	Keith, , United Kingdom	2013-06-08
Debbie walker	London, , United Kingdom	2013-06-08
henry garrett	ringwood, , United Kingdom	2013-06-08
Louise Aston	London, , United Kingdom	2013-06-08
gerard coles	Bath, Eng, United Kingdom	2013-06-08
Alison Perkins	Manchester, , United Kingdom	2013-06-08
Pat Armstrong	Bangor, Wal, United Kingdom	2013-06-08
Elisabeth Geake	Henley-on-Thames, United Kingdom	2013-06-08
Elya Holmes-Rol	France	2013-06-08
Elizabeth Colcutt	Wetheridge, Eng, United Kingdom	2013-06-08
Nicolas Rol	France	2013-06-08
Catherine Cubitt	York,	2013-06-08
J.Louis Pozo	Bath, Eng, United Kingdom	2013-06-08
Anne Winpenny	Bath, Eng, United Kingdom	2013-06-08
Don Church	Ash Priors, United Kingdom	2013-06-08
thelma wilcox	Chelmsford,	2013-06-08
Lyle Browning	Midlothian, VA, United States	2013-06-08

<b>Name</b>	<b>Location</b>	<b>Date</b>
Charlotte Barlow	Bristol, United Kingdom	2013-06-08
Paul Wills	Chelmsford,	2013-06-08
Carol Maltby	Olivebridge, NY, United States	2013-06-08
Peter Duppa-Miller	Combe Hay, Eng, United Kingdom	2013-06-08
Margaret Duppa-Miller	Combe Hay, Eng, United Kingdom	2013-06-08
Shazia Juna	Graz, Stm, Austria	2013-06-08
バリー 佐知子	Bath and North East Somerset, , United Kingdom	2013-06-08
Suki Maltby-Duggan	Olivebridge, NY, United States	2013-06-08
Finlay McArthur	Inverness, , United Kingdom	2013-06-08
Tom Geake	Bath, Eng, United Kingdom	2013-06-08
Ian Sharples	Preston,	2013-06-09
Chris Cumberpatch	Sheffield, Eng, United Kingdom	2013-06-09
Nigel Roberts	Bath,	2013-06-09
simon flaherty	Bath, Eng, United Kingdom	2013-06-09
Kate Cole	London, United Kingdom	2013-06-09
Laura Derry	Bury St Edmunds, , United Kingdom	2013-06-09
Yaniola Butt	Dorchester, Eng, United Kingdom	2013-06-09
Harper Fox	Hexham, , United Kingdom	2013-06-09
MAtt McArdle	Bath,	2013-06-10
Barbara Remedios	Pasadena, CA, United States	2013-06-10
Joanne Rippin	Bath, Eng, United Kingdom	2013-06-10
Fave Musgrove	Bath, United Kingdom	2013-06-10
Joanna Campbell	Bath,	2013-06-10
Melanie Jackson	Bath, Eng, United Kingdom	2013-06-10
steve henwood	Bath, Eng, United Kingdom	2013-06-10
Vikki Sage	Bath,	2013-06-11
Richard Warwick	Bath,	2013-06-11
mark minkler	bath,	2013-06-11
Bryan Rippin	Bath, Eng, United Kingdom	2013-06-11
Jan Rippin	Bath,	2013-06-11
Georgia Mills	Bath,	2013-06-11

<b>Name</b>	<b>Location</b>	<b>Date</b>
Elizabeth Daniel	Bath,	2013-06-11
TRUDY HARRISON	Bath,	2013-06-11
peter foster	Bath, Eng, United Kingdom	2013-06-11
Aylet Anderson	Bath,	2013-06-11
Geoffrey Davis	Bath,	2013-06-11
Tania Rodrigues	Bath,	2013-06-11
Lynda Le Ray	Bath,	2013-06-11
Alison Scott	Bath,	2013-06-11
ELAINE MILLS	Bath,	2013-06-11
Robert Anderson	Bath,	2013-06-11
Mark Lacey	Bath, Eng, United Kingdom	2013-06-11
Narp Nandi	Bath,	2013-06-12
Patricia Laycock	Frome, Eng, United Kingdom	2013-06-12
Erica Smith	bath,	2013-06-12
Susan Crookes	Bath, Eng, United Kingdom	2013-06-12
Liz KELLY	Bath, Eng, United Kingdom	2013-06-12
Emma Robson	Liverpool, , United Kingdom	2013-06-12
Colin Horsley	Bath,	2013-06-13
Rachel Jackson	Bath, Eng, United Kingdom	2013-06-13
Lesley Davies	Bath,	2013-06-13
james ure	bath,	2013-06-13
Frances Phillips	Combe Hay,	2013-06-13
Justine Wright	Bath,	2013-06-13
Paul Coyne	Bath, Eng, United Kingdom	2013-06-13
Carla Curtis	Bath, United Kingdom	2013-06-13
JUDITH WALKER	BATH,	2013-06-14
STEPHEN HENLEY	BATH,	2013-06-14
Claire Riou	Bath,	2013-06-14
Douglas Milsom	Bath, Eng, United Kingdom	2013-06-14
Stacey Calvert	Sunderland, , United Kingdom	2013-06-14
rosemary forgan	London, , United Kingdom	2013-06-14
ANDY CRITCHELL	PORTSMOUTH, , United Kingdom	2013-06-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Amanda Whitelock	Bath, United Kingdom	2013-06-14
Michelle Hodges	Taunton, , United Kingdom	2013-06-14
Rupert Douglas-Bate	Addis Ababa & UK,	2013-06-14
Sean Hipkiss	Birmingham, , United Kingdom	2013-06-14
aysegulaksoy@hotmail.co.uk aksoy	arkansas USA,	2013-06-14
Olga Kozłowska	Northampton, , United Kingdom	2013-06-14
Nicky Sellick	Australia	2013-06-15
Susan Luckman	Birmingham, , United Kingdom	2013-06-15
john rumary	lamberhurst, , United Kingdom	2013-06-15
Kim Chenoweth	Exeter,	2013-06-15
MARTIN DAVIS	Bath, Eng, United Kingdom	2013-06-15
Steve Rose	Bath, Eng, United Kingdom	2013-06-15
Jackie Stapleton	Notts, , United Kingdom	2013-06-15
BEVERLEY HOLDEN	CONWY, , United Kingdom	2013-06-15
charlotte moncrieff	swansea, , United Kingdom	2013-06-15
Racquel Ayers	Woking, Eng, United Kingdom	2013-06-15
teresa mcmenamain	Dover, Eng, United Kingdom	2013-06-15
maggie thomas	Loughton, , United Kingdom	2013-06-15
Nicholas Field	London,	2013-06-15
Katrine Basso	Thurrock, , United Kingdom	2013-06-15
Colin Jenkins	Stowmarket, , United Kingdom	2013-06-15
Michelle Parsons	Bath, United Kingdom	2013-06-15
Lisa Dinsmore	Birmingham, , United Kingdom	2013-06-15
Emma Major	York, , United Kingdom	2013-06-15
Anthony Paul	Bath, Eng, United Kingdom	2013-06-16
daniel lloyd	Bristol, Eng, United Kingdom	2013-06-16
anthony freear	Bath, Eng, United Kingdom	2013-06-17
Charlotte Obolensky	Bath,	2013-06-17
Joanna Livall	Bath,	2013-06-17
rebecca Arbaud	Bath, Eng, United Kingdom	2013-06-17
libby birts	bath,	2013-06-17

<b>Name</b>	<b>Location</b>	<b>Date</b>
Andrew Claridge	Trowbridge, Eng, United Kingdom	2013-06-18
Rachel Ashworth	Freshford, United Kingdom	2013-06-18
Caroline Cruickshank	France	2013-06-18
Joseph Sholay	london, , United Kingdom	2013-06-18
MARY FRY	BATH, , United Kingdom	2013-06-20
Elaine Lomath	Bath, Eng, United Kingdom	2013-06-20
Bryan Williams	Bath, Eng, United Kingdom	2013-06-20
Azra Dale	Bath,	2013-06-20
Dale Van Steinburg	Bath,	2013-06-21
Charles Row	Bath, United Kingdom	2013-06-21
Allan Williams	Bath, United Kingdom	2013-06-21
PATRICIA STEWART	STOCKTON ON TEES,	2013-06-21
Elaine Tucker	St. John's, Canada	2013-06-22
Robert Wild	Bath, Eng, United Kingdom	2013-06-22
Rachel Wstton	Bath, Eng, United Kingdom	2013-06-24
Michael Godwin	Bath, ; United Kingdom	2013-06-24
Anna Smith	Bath, Eng, United Kingdom	2013-06-24
Peter Shirley	Bath,	2013-06-24
Diana Hopkins	Bath,	2013-06-25
Magdalen Goodbody	Bath,	2013-06-25
Ned Garnett	Bath,	2013-06-26
Liz Bloor	Bath, United Kingdom	2013-06-27
Lola Straw	Bath, Eng, United Kingdom	2013-06-27
Stefan Perkins	Bath, Eng, United Kingdom	2013-06-27
Fiona Bruce	Bath, United Kingdom	2013-06-27
David Newman	Bath,	2013-06-28
Jeremy Sanders	Chippenham, Eng, United Kingdom	2013-06-29
Rhydian Williams	Manchester, Eng, United Kingdom	2013-07-01
Nancy Coppock	Bath,	2013-07-01
Claire Key	Bath,	2013-07-01
Richard Agar Ward	Bath,	2013-07-01
Francis Grant	Bristol, Eng, United Kingdom	2013-07-01

<b>Name</b>	<b>Location</b>	<b>Date</b>
Marie Weinel	Bath, Eng, United Kingdom	2013-07-01
Tim Leach	Bath, United Kingdom	2013-07-01
kaz TAKABATAKE	london,	2013-07-01
Mark Summers	Bath, Eng, United Kingdom	2013-07-02
Naomi Summers	Bath, Eng, United Kingdom	2013-07-02
Emma Russell	Bath, , United Kingdom	2013-07-02
Sarah Williams	Bath, , United Kingdom	2013-07-02
Lucy Black	Fowey, , United Kingdom	2013-07-02
john brooke	bath,	2013-07-02
Sarah Matthews	Fowey,	2013-07-02
Gillian Austwick	Bath,	2013-07-03
Leigh @ Alan Book	Bath,	2013-07-03
Sue Saker	Bath,	2013-07-03
jo Menneer	bath, United Kingdom	2013-07-03
faye johnson	Corsham, Eng, United Kingdom	2013-07-04
julia johnson	Bath, Eng, United Kingdom	2013-07-04
sheridan Forbes	Bath, Eng, United Kingdom	2013-07-07
Kitty Ure	Bath,	2013-07-07
ewan robertson	bath,	2013-07-07
Robert Parfitt	Bath,	2013-07-08
Mark Dunningham	Bath, Eng, United Kingdom	2013-07-08
Wesley Smith	bath,	2013-07-08
Amy Dunningham	Cardiff, United Kingdom	2013-07-08
toni rhoden	Bath, Eng, United Kingdom	2013-07-08
patrick smith	Bath, Eng, United Kingdom	2013-07-08
Sue Dunningham	Bath,	2013-07-08
Marie-Claire Oliver	Bath, Eng, United Kingdom	2013-07-10
Chloe Turner	Bristol, Eng, United Kingdom	2013-07-10
Dawn Connor	Gloucestershire, United Kingdom	2013-07-10
Helen John	Bath, United Kingdom	2013-07-11
Carly Gibson	Charfield, United Kingdom	2013-07-11
Jon Collins	London,	2013-07-11

<b>Name</b>	<b>Location</b>	<b>Date</b>
Vivienne Pozo	Bath,	2013-07-11
will kippax	bath,	2013-07-11
Graham Davis	Bath, Eng, United Kingdom	2013-07-11
Fiona Sharples	Wotton-under-Edge, Eng, United Kingdom	2013-07-12
Michael Horton	Bath, Eng, United Kingdom	2013-07-12
Jonathan Turner	Wotton-under-Edge, United Kingdom	2013-07-12
jan tozer	Bath,	2013-07-15
Deborah Pennock	Bath, Eng, United Kingdom	2013-07-15
Deborah Ireland	Bath,	2013-07-15
Laura Moorcroft	Bath, United Kingdom	2013-07-15
Verity Barber	bath, United Kingdom	2013-07-15
James Brook	Bath,	2013-07-16
James Marett	Cirencester, Eng, United Kingdom	2013-07-16
Diana Cochran	Bath,	2013-07-16
Alison Humphries	Bath, Eng, United Kingdom	2013-07-16
Amy Brook	Batg, United Kingdom	2013-07-16
Stephen Pennock	Bath, Eng, United Kingdom	2013-07-16
Karen Robinson	Bath, Eng, United Kingdom	2013-07-16
Amanda Vesey	Bath,	2013-07-17
Morag Aitken	Bath,	2013-07-17
Mandy Wilson-Garner	Bath,	2013-07-17
Marjorie Bartholomew	Bath,	2013-07-17
Betty Marsland-Bulley	Bath, Eng, United Kingdom	2013-07-17
Catherine Stokes	Bath,	2013-07-19
wendy lambson	Bath, Eng, United Kingdom	2013-07-22
Wendy Turner	Clevedon, , United Kingdom	2013-07-22
Shaun Freeman	Bath, Eng, United Kingdom	2013-07-23
Aileen Oldfield	Bath, Eng, United Kingdom	2013-07-25
Jack Herincx	Bath, Eng, United Kingdom	2013-07-26
Caroline Frances-King	Bath,	2013-07-27
Catherine Beale	Bath,	2013-07-27
leann scane	bath,	2013-07-27

<b>Name</b>	<b>Location</b>	<b>Date</b>
keith budden	RINHm, Kent,	2013-07-27
Rebecca Sachdev	Tylers Green, Penn, United Kingdom	2013-07-27
Paul Roberts	United Kingdom	2013-07-27
Meg Fenwick	Manchester, Eng, United Kingdom	2013-07-27
Nick Hart-Williams	Bath, , United Kingdom	2013-07-27
Alice Icely	oxford, United Kingdom	2013-07-27
Nicky Jack	london,	2013-07-27
Hannah Whitworth	Bath, Eng, United Kingdom	2013-07-27
nathan hughes	Bath, Eng, United Kingdom	2013-07-28
Samantha Gegg	corsham, United Kingdom	2013-07-28
Miriam Osner	Leeds, Eng, United Kingdom	2013-07-28
Paul Cheshire	Bath, Eng, United Kingdom	2013-07-28
Lindy Platt	Bath,	2013-07-28
Henri Straub	Rotterdam, Netherlands	2013-07-28
Laura McFadden	Bristol, United Kingdom	2013-07-28
Jennifer Barrie	bath, , United Kingdom	2013-07-29
Patricia Hutton	Bradford-on-Avon, , United Kingdom	2013-07-29
Jennifer Crossley	Bournemouth, Eng, United Kingdom	2013-07-29
Jonathan Herold	Toronto, Canada	2013-07-29
Kate Peters	Bath, Eng, United Kingdom	2013-07-29
Jesse Mackewn	London, United Kingdom	2013-07-29
Andrew Camp	Bath, Eng, United Kingdom	2013-07-29
Janet Armstrong	Bath, Eng, United Kingdom	2013-07-29
Louise Brouard	Bath, Eng, United Kingdom	2013-07-29
Neil Nickolds	Sutton Coldfield, , United Kingdom	2013-07-29
Ian Whitfield	Bath, , United Kingdom	2013-07-29
Nicola Catchpool	Bath, Eng, United Kingdom	2013-07-29
Michael Williams	Bath, Eng, United Kingdom	2013-07-30
David Foord	Bath, , United Kingdom	2013-07-30
James Mortimer	Bath,	2013-07-30
Caroline Purdy	Bath, United Kingdom	2013-07-30
Pauline McCaig Scott	Bath, , United Kingdom	2013-07-30

<b>Name</b>	<b>Location</b>	<b>Date</b>
James Calvert-Jones	Bath, United Kingdom	2013-07-31
Katie Calvert-Jones	Bath, United Kingdom	2013-07-31
Lucy Bennett	Hilperton, United Kingdom	2013-07-31
Michael ServiceBath	Bath,	2013-07-31
Tim Calvert-Jones	Bath, United Kingdom	2013-07-31
Kate Woodthorpe	Bath, Eng, United Kingdom	2013-07-31
Naresh Claire	Bath, Eng, United Kingdom	2013-07-31
Patricia Batcheldor	Bath,	2013-07-31
Sharon Cann	France	2013-07-31
Joan Schrecker	Bath,	2013-07-31
Roisin Couzins	Bath, Eng, United Kingdom	2013-07-31
Joel Cockhill	London, , United Kingdom	2013-07-31
Emma Feasby	Corsham, United Kingdom	2013-07-31
Alan Batcheldor	Bath, Eng, United Kingdom	2013-08-01
Daniel Batcheldor	Bath, United Kingdom	2013-08-01
Sara Wiltshire	London,	2013-08-01
Cally Thomson	Oxford,	2013-08-01
Tara Whelan	London, Eng, United Kingdom	2013-08-01
Alice Rees	Bath, Eng, United Kingdom	2013-08-01
Anthony Howard	Bath, Eng, United Kingdom	2013-08-01
Mark Bale	Wells, United Kingdom	2013-08-01
Sylvia Mason	Derby, Eng, United Kingdom	2013-08-01
Phil Jackman	Trowbridge, Eng, United Kingdom	2013-08-01
Andrew Wetherill	Winsley, United Kingdom	2013-08-01
Christian Routh	Spain	2013-08-02
suzan jackman	Chandler's Ford, United Kingdom	2013-08-02
Mark Slater	United Kingdom	2013-08-02
Joss Davis	Clifton-upon-Teme, , United Kingdom	2013-08-02
Duncan Hall	Bath, Eng, United Kingdom	2013-08-02
Sarah Lynott	Bath,	2013-08-03
Robbie Tack	Bath,	2013-08-03
Sandra Caudwell	Cheltenham, Eng, United Kingdom	2013-08-04

<b>Name</b>	<b>Location</b>	<b>Date</b>
Rosie Morgan	Bath, United Kingdom	2013-08-05
melissa price	bath, United Kingdom	2013-08-05
Robin Attwater	Bath,	2013-08-05
Geoffrey Harris	Lincoln,	2013-08-06
James Thorp	canterbury, , United Kingdom	2013-08-07
Fay Wild	Bath, United Kingdom	2013-08-09
Phil Harding	Bristol, , United Kingdom	2013-08-11
Lance Dyer	Truro, United Kingdom	2013-08-11
Sarah Khouri	Bath, Eng, United Kingdom	2013-08-11
Jonathan Day	Bath, , United Kingdom	2013-08-11
Michael Ayles	bath,,	2013-08-11
Sue Ayles	Bath, United Kingdom	2013-08-11
Jessica Palmer	Bath,	2013-08-12
John Wright	Bath,	2013-08-14
Alexander John	London, , United Kingdom	2013-08-15
jane brimble	BATH, , United Kingdom	2013-08-15
Anna McQuaid	Bath, Eng, United Kingdom	2013-08-15
Victor Windt	Bath, Eng, United Kingdom	2013-08-16
Ced Bufton	Bath, Eng, United Kingdom	2013-08-16
Hilary Bufton	Bath, Eng, United Kingdom	2013-08-16
Hilary Elms	Bath,	2013-08-16
Nicky and Alan March	Bath,	2013-08-16
Adrian Stenning	Bath, Eng, United Kingdom	2013-08-16
Graham Wake	Mexico	2013-08-16
Sophie Bufton	Bath, Eng, United Kingdom	2013-08-16
DIANE SHEARN	Bath, Eng, United Kingdom	2013-08-16
pete rybacki	bath,	2013-08-17
Greg Dring	Bath, Eng, United Kingdom	2013-08-17
Richard Pearce	Bath, , United Kingdom	2013-08-17
Wei-Hsien Wan	Exeter, Eng, United Kingdom	2013-08-17
mark dustin	Bath, Eng, United Kingdom	2013-08-17
Claire Dustin	Bath, Eng, United Kingdom	2013-08-17

<b>Name</b>	<b>Location</b>	<b>Date</b>
Sue Lee	Cambridge, Eng, United Kingdom	2013-08-17
Lynda & Richard Botwood	Bath, Eng, United Kingdom	2013-08-17
David Stone	Bath, Eng, United Kingdom	2013-08-18
Antoinette Midgley	Bath, Eng, United Kingdom	2013-08-18
Elena Wheelhouse	Midford Bath,	2013-08-18
Linda Davies	Bath,	2013-08-18
Carrie Cotterill	Warwickshire,	2013-08-18
Stephen Beardshaw	Bath, Eng, United Kingdom	2013-08-18
Hannah Sullivan	Bath,	2013-08-18
Sheila Neill	Bath,	2013-08-18
Valerie Summers	South Stoke, Eng, United Kingdom	2013-08-18
Tony Ashworth	Bath,	2013-08-19
Michael Edge	Bath,	2013-08-19
Lynne Bellacomo	Bath,	2013-08-19
Ursula Brooke	BATH,	2013-08-19
John Richard Young	EAST NORRITON, MONTGOMERY COUNTY, PA, United States	2013-08-19
Antonia Johnson	Bath, Eng, United Kingdom	2013-08-19
Mandy, Charlotte + Ash Bliss	Bath, Eng, United Kingdom	2013-08-19
Jane Gutteridge	Hereford,	2013-08-19
Jamie Feetham	Sheffield, United Kingdom	2013-08-19
Jane Martinez	Bath, , United Kingdom	2013-08-19
David Cox	Bradford-on-Avon, Eng, United Kingdom	2013-08-19
M Bailey	Bath, United Kingdom	2013-08-19
Tracy Hager	Bath,	2013-08-19
Nicola James	Bath, , United Kingdom	2013-08-19
Charlotte Ccaddick	Plymouth, United Kingdom	2013-08-19
Johanna Badder Goode	Bath, United Kingdom	2013-08-19
nikki bell	Bath, Eng, United Kingdom	2013-08-19
Rebecca Allen	Bath, , United Kingdom	2013-08-19
nicky matthews	bath, , United Kingdom	2013-08-20
simon johnson	bath,	2013-08-20

<b>Name</b>	<b>Location</b>	<b>Date</b>
Kerriane Gauld	Bath,	2013-08-20
andrew frayling	Bath, Eng, United Kingdom	2013-08-20
Tam Rundle	Bradford-on-Avon, , United Kingdom	2013-08-20
gillie strong	bradford-on-Avon, , United Kingdom	2013-08-20
Sarah Wright	West Pennard, United Kingdom	2013-08-20
Anna Raven	Ardgour, Fort William, , United Kingdom	2013-08-20
Joanne Hill	Bradford-on-Avon, Eng, United Kingdom	2013-08-20
Sarah-Jane Keighley	Bath, Eng, United Kingdom	2013-08-20
Penny Gallagher	bath, , United Kingdom	2013-08-20
Deborah Jane	Bath, Eng, United Kingdom	2013-08-21
Katherine Heffer	Bath,	2013-08-21
Fred Simon	Bath,	2013-08-21
Georgina Brown	Bath, United Kingdom	2013-08-21
Helen Rugg	Bath,	2013-08-21
Elizabeth Matthews	Bath,	2013-08-21
Alison Kearin	Tondela, Vis, Portugal	2013-08-21
jacqueline ridlington	bath, , United Kingdom	2013-08-21
lizzie melling	bath, United Kingdom	2013-08-21
erika Tobiassen	Bristol, Eng, United Kingdom	2013-08-21
Abigail Wheatcroft	Bath, , United Kingdom	2013-08-21
Alexandra CONNELL	Chippenham,	2013-08-21
Alexandra Farnham-Finch	Bath, United Kingdom	2013-08-21
Ben Garner	Bath,	2013-08-21
matt jarosy	Bath, Eng, United Kingdom	2013-08-21
caron elgey	Bath, , United Kingdom	2013-08-22
Jane Cox	Bath, Eng, United Kingdom	2013-08-22
Simon Green	London, United Kingdom	2013-08-22
David Eachus	bath, , United Kingdom	2013-08-22
james seaton	london,	2013-08-22
Kate Best	London, , United Kingdom	2013-08-22
Mike Ballard	Bath, , United Kingdom	2013-08-22
Val Lyon	Bath,	2013-08-22

<b>Name</b>	<b>Location</b>	<b>Date</b>
Callie braz	Bath,	2013-08-22
Fiona Cassidy	Bath, , United Kingdom	2013-08-22
Alan Wright	Bath,	2013-08-22
Denise Tavernor	Bath, United Kingdom	2013-08-22
Valerie Rutley-Paine	Dilton Marsh, , United Kingdom	2013-08-22
kathy pflaum	bath,	2013-08-22
Isobel Muir	London, , United Kingdom	2013-08-22
Gillian Hall	Bath, , United Kingdom	2013-08-22
troy helps	london, , United Kingdom	2013-08-22
Susan Clifford	Combe Hay, United Kingdom	2013-08-23
Alan Bond	Bath,	2013-08-23
Penny Hardie	Basingstoke, , United Kingdom	2013-08-23
Colin Bauld	Upavon, United Kingdom	2013-08-23
Mike Mason	Colchester, United Kingdom	2013-08-23
Sarah Bond	Bath, Eng, United Kingdom	2013-08-23
samantha marcussen	Oxford, Eng, United Kingdom	2013-08-23
Nicky Bellacomo	Bath,	2013-08-23
Diane Fry	Bath, Eng, United Kingdom	2013-08-23
Jason Morell	London, , United Kingdom	2013-08-23
Catherine Chambers	Bath, Eng, United Kingdom	2013-08-24
Ann Ridgway	Croprey, Eng, United Kingdom	2013-08-24
Debbie Moore	Bath,	2013-08-24
Susan Lee	Bath, Eng, United Kingdom	2013-08-24
Sue Graham-Brown	Bath,	2013-08-24
Jim McAuliffe	Frome, , United Kingdom	2013-08-25
Alistair Bradley	Bath, Eng, United Kingdom	2013-08-25
Stuart Seale	Bath, Eng, United Kingdom	2013-08-25
Marcus Cooper	Bath,	2013-08-25
Jamie Cooper	Bath, United Kingdom	2013-08-25
Martin Cooper	Brighton, Eng, United Kingdom	2013-08-26
melvin piamonte	banes, United Kingdom	2013-08-26
margaret cooper	bath,	2013-08-26

<b>Name</b>	<b>Location</b>	<b>Date</b>
Nick Swift	Woodcote, United Kingdom	2013-08-26
Bridget Baker	Bath,	2013-08-26
Warwick Bishop	Brighton.,	2013-08-27
Martin Dee	Bath,	2013-08-27
Pamela Deen	Bath,	2013-08-27
Stuart Knowles	Bath,	2013-08-27
Peter Myers	Bath,	2013-08-27
Angela Vick	Bath, , United Kingdom	2013-08-28
Neil Jackson	BATH,	2013-08-28
Angela Galpin	Bath, Eng, United Kingdom	2013-08-28
Sean Smith	Bath,	2013-08-29
Laura Stolper	Bath,	2013-08-29
Timothy Eustace	Bath, Eng, United Kingdom	2013-08-29
Paul Oaten	Bath,	2013-08-29
Graham Jones	BATH,	2013-08-29
cherry bretten	Bristol, Eng, United Kingdom	2013-08-29
Samuel Priestman	Bath,	2013-08-29
ines Riou	Bath, Eng, United Kingdom	2013-08-29
Karen Brennand	Bath,	2013-08-29
Neil Robertson	Bath, Eng, United Kingdom	2013-08-29
Jane Harris	Bath, Eng, United Kingdom	2013-08-29
vera forsyth	bath,	2013-08-29
michelle aitken	bath, , United Kingdom	2013-08-29
David Stenning	Bath,	2013-08-29
Celia Mead	Bath, Eng, United Kingdom	2013-08-29
Michael de Grey	Bath, Eng, United Kingdom	2013-08-29
Martin Palmer	Bath, Eng, United Kingdom	2013-08-29
Tracy Adlington	Bath, United Kingdom	2013-08-29
Olivia Adlington	Bath, United Kingdom	2013-08-29
Simon Calvert-Jones	Bath, Eng, United Kingdom	2013-08-29
Howard Edwards	Bath,	2013-08-29
Angela Edwards	Bath,	2013-08-29

<b>Name</b>	<b>Location</b>	<b>Date</b>
terence corkin	Bath, Eng, United Kingdom	2013-08-29
michael fathers	Bath,	2013-08-29
Margaret Dagger	BATH,	2013-08-29
Josef Karthausser	Bath,	2013-08-29
Diana Prescott	Bath, , United Kingdom	2013-08-29
Hugh Mackay	Bath,	2013-08-29
Joanna Carter	Bath, Eng, United Kingdom	2013-08-29
Suzie Shaw	United Kingdom	2013-08-29
Shan Parfitt	Aberdeen, , United Kingdom	2013-08-29
ev davies	bath,	2013-08-29
Colin Page	Bath, , United Kingdom	2013-08-29
Henry Robin Anderson	Bath,	2013-08-29
Jacky Sloane	Bath, United Kingdom	2013-08-29
pat solomon	Bath, Eng, United Kingdom	2013-08-29
Anthony Weale	Bath, England, United Kingdom,	2013-08-29
H Jane Weller	Corsham, Eng, United Kingdom	2013-08-29
Nick Hawkins	Bath, England, United Kingdom,	2013-08-29
Julia ADAMS	Bath,	2013-08-29
matt hanna	Bath, Eng, United Kingdom	2013-08-29
Mary Roberts	Bath, Eng, United Kingdom	2013-08-29
Keith Woodley	Bath,	2013-08-29
Mrs. June Thomas	Bath,	2013-08-29
Charlotte Obolensky	Bath, Eng, United Kingdom	2013-08-29
Greg Hartley-Brewer	Bath, Eng, United Kingdom	2013-08-29
Peter Basterfield	Corsham ,	2013-08-29
Andy Elvin	Bath, , United Kingdom	2013-08-29
Janet Plater	Bath, , United Kingdom	2013-08-29
Julie Doman	Monkton Combe,	2013-08-29
Joyce Woodley	Bath, United Kingdom	2013-08-29
Neil Garrett	Bath,	2013-08-29
Christina Crockett	Bath,	2013-08-29
Gillian Elliott	Bath, , United Kingdom	2013-08-29

<b>Name</b>	<b>Location</b>	<b>Date</b>
Frank Wagstaff	Bath,	2013-08-29
roland newman	Bath, Eng, United Kingdom	2013-08-29
Eleni Kapsali	London,	2013-08-29
oliver stanley	stafford,	2013-08-29
Jane Miller	Chippenham, Eng, United Kingdom	2013-08-29
Joshua West	Sheffield,	2013-08-29
kieron young	Rotherham,	2013-08-29
Martin Hodges	bristol,	2013-08-29
Megan fitch	March,	2013-08-29
Simon Caswell	Dudley,	2013-08-29
Grant Powell	Swindon,	2013-08-29
catherine harding	bristol, , United Kingdom	2013-08-29
fred dale	caterham, , United Kingdom	2013-08-29
beverly gannon	london, , United Kingdom	2013-08-30
stephen jones	Manchester,	2013-08-30
sophie delboux	Cambridge, , United Kingdom	2013-08-30
Richard Davies	Woodley, Eng, United Kingdom	2013-08-30
David Romero	bristol,	2013-08-30
Nancy Nudds	Huddersfield, , United Kingdom	2013-08-30
Valerie Mead	Bath, Eng, United Kingdom	2013-08-30
bernadette woodall	London, , United Kingdom	2013-08-30
lisa hunter	london, , United Kingdom	2013-08-30
Andi Ginns-farrow	Nottingham, Eng, United Kingdom	2013-08-30
Valerie Wise	Horsham,	2013-08-30
Laura Nettleton	Bogis-Bossey, VD, Switzerland	2013-08-30
Lorraine Dye	Nottingham, Eng, United Kingdom	2013-08-30
Helen Patel	Gravesend, , United Kingdom	2013-08-30
Alison Fifield	Northampton, , United Kingdom	2013-08-30
Luna Dance	devon, , United Kingdom	2013-08-30
Fergus C McLachlan	glasgow, , United Kingdom	2013-08-30
judyta karaszewska	soth kirkby, , United Kingdom	2013-08-30
Andrew Broadbent	Manchester, , United Kingdom	2013-08-30

<b>Name</b>	<b>Location</b>	<b>Date</b>
Andrew Frost	Swindon, , United Kingdom	2013-08-30
Adam Stritten	United Kingdom	2013-08-30
Jon Orchard	Sheffield, , United Kingdom	2013-08-30
Rachael Mott	Norwich, Eng, United Kingdom	2013-08-30
Norman Glass	London, , United Kingdom	2013-08-30
Callum McNally	Portadown, Nor, United Kingdom	2013-08-30
Rebecca Johnson	Huddersfield,	2013-08-30
Jonathan Noble	Barnsley, , United Kingdom	2013-08-30
tricia donegan	Erskine, Scotland, United Kingdom, , United Kingdom	2013-08-30
Paola Catapano	Retford, , United Kingdom	2013-08-30
Neale White	South Shields, Eng, United Kingdom	2013-08-30
Lesley McArthur	Lincoln, , United Kingdom	2013-08-30
neil furlonger	Chichester, Eng, United Kingdom	2013-08-30
charlotte primrose	manningtree, , United Kingdom	2013-08-30
robin wood	Sheffield,	2013-08-30
Hilary Bates	Pontardawe, , United Kingdom	2013-08-30
Amanda Jordan	Brighton, , United Kingdom	2013-08-30
Geoff Mead	Bath, Eng, United Kingdom	2013-08-30
Nora James	Swanage, , United Kingdom	2013-08-30
Sarah Tyndall	Huddersfield, , United Kingdom	2013-08-30
nick manning	Cambridge, , United Kingdom	2013-08-30
Jennifer Folca	Dartmouth, Eng, United Kingdom	2013-08-30
DEBORAH DOCHERTY	PEMBROKESHIRE,	2013-08-30
ADEL LAZIZI	London, , United Kingdom	2013-08-30
peter goodall	Cleckheaton, , United Kingdom	2013-08-30
Stella Dyer	Bristol, Eng, United Kingdom	2013-08-30
James Heydon	Sheffield, Eng, United Kingdom	2013-08-30
helen corkin	Bath, Eng, United Kingdom	2013-08-30
nick charlesworth	clevedon,	2013-08-30
Salwah Koriya	London, , United Kingdom	2013-08-30
Ardjuna Clearwater	Leven, Sco, United Kingdom	2013-08-30

<b>Name</b>	<b>Location</b>	<b>Date</b>
samuel robb	london,	2013-08-30
Omur Ozbahceliler	Edinburgh, Sco, United Kingdom	2013-08-30
Suzanne Kerr	Low Hesket, , United Kingdom	2013-08-30
julia gaskin	LONDON, , United Kingdom	2013-08-30
Ryan Jones	Preston, Eng, United Kingdom	2013-08-30
Jo Watkins	Sheffield,	2013-08-30
David Southey	Odiham, Eng, United Kingdom	2013-08-30
Joseph Richards	Exeter, , United Kingdom	2013-08-30
Gillian Dana	Bexhill on Sea, , United Kingdom	2013-08-30
Lexie Collins	Littlehampton, Eng, United Kingdom	2013-08-30
Siobhan Reynolds	Henfield, , United Kingdom	2013-08-30
Victor Self	Dagenham, , United Kingdom	2013-08-30
Guy Hansford	Troon, Sco, United Kingdom	2013-08-30
michele pearce	Paignton, Eng, United Kingdom	2013-08-30
Zeta Held	Wales, , United Kingdom	2013-08-30
Emma Spurgin Hussey	Truro, , United Kingdom	2013-08-30
Dell James	Ipswich, Eng, United Kingdom	2013-08-30
Thomas Frost	Hull,	2013-08-30
Amy Gardiner	Dundee, , United Kingdom	2013-08-30
Madeleine Wilson	Dundee, Sco, United Kingdom	2013-08-30
Billie-Laura Remington	Birmingham, Eng, United Kingdom	2013-08-30
Gail Courtney	London, , United Kingdom	2013-08-30
Jacqueline Garratt	United Kingdom	2013-08-30
marie podolanski	blackpool, , United Kingdom	2013-08-30
Denise Mosley	Gateshead, Eng, United Kingdom	2013-08-30
Ben Neville	Dunoon,	2013-08-30
tomi nicolae	Stoke-on-Trent, Eng, United Kingdom	2013-08-30
John Ward	Coventry,	2013-08-30
annaliese@sistersofthechurch.org.uk Brogden	Richmond TW10 7JH, , United Kingdom	2013-08-30
Sandra Fox	Sheffield,	2013-08-30
Aine O'Neill	London, , United Kingdom	2013-08-30

<b>Name</b>	<b>Location</b>	<b>Date</b>
Christine Priestley	Warwick, , United Kingdom	2013-08-30
Tapas Basu	Chester, , United Kingdom	2013-08-30
Julie Kelf	Great Yarmouth, Eng, United Kingdom	2013-08-30
Chris Styles	Norwich, Eng, United Kingdom	2013-08-30
Kiril IOVTCHEV	Swindon, Eng, United Kingdom	2013-08-30
Susie Shaw	London, , United Kingdom	2013-08-30
Ravi Gulati	Harrow, , United Kingdom	2013-08-30
Mal Blackshaw	Scunthorpe, Eng, United Kingdom	2013-08-30
Dave Chick	Wakefield, Eng, United Kingdom	2013-08-30
gerard horobin	Liverpool, Eng, United Kingdom	2013-08-30
Nicola Watling	Hampshire, , United Kingdom	2013-08-30
Waverly Ferrell	Wisbech, , United Kingdom	2013-08-30
pamela johnstone	fort william, , United Kingdom	2013-08-30
Kenn Winter	Huddersfield,	2013-08-30
Gulsen Gulsen	Brighton, , United Kingdom	2013-08-30
Hanna Wine	London, , United Kingdom	2013-08-30
Claire Bulman	London,	2013-08-30
Rob Yarwood	Coventry, , United Kingdom	2013-08-30
Miranda Gill	london, , United Kingdom	2013-08-30
Annamarie Tatum	SOUTHAMPTON, , United Kingdom	2013-08-30
denis mchugh	aberdeen,	2013-08-30
Lauren Greenaway	Manchester, , United Kingdom	2013-08-30
juliette child	oxfordshire, , United Kingdom	2013-08-30
Kathleen Burley	Barnsley, , United Kingdom	2013-08-30
Daniel Grant	Bournemouth, , United Kingdom	2013-08-30
Roberta Wallace	Tamworth, Eng, United Kingdom	2013-08-30
Samson Pia	London, , United Kingdom	2013-08-30
lucian sanda	Brighton, , United Kingdom	2013-08-30
Peter neilson	Kelso, Sco, United Kingdom	2013-08-30
Louise Groom	London,	2013-08-30
ken findlay	Knaresborough, Eng, United Kingdom	2013-08-30
Clare Williams	Colchester, , United Kingdom	2013-08-30

<b>Name</b>	<b>Location</b>	<b>Date</b>
adeniyi ademola adeleke	Barking, , United Kingdom	2013-08-30
sara reynolds	haywards heath, , United Kingdom	2013-08-30
John Wilson	Farnham, Surrey, , United Kingdom	2013-08-30
esther mansoor	London, , United Kingdom	2013-08-30
Dawn Barton	Borehamwood, , United Kingdom	2013-08-30
Jenny Suthrell	Oxford, Eng, United Kingdom	2013-08-30
Hazel Ryan	Whitstable, Eng, United Kingdom	2013-08-30
Jeremy Donaldson	United Kingdom	2013-08-30
John Burrows	Leicester,	2013-08-30
bob wert	Leicester,	2013-08-30
Sheri Newman	Dunstable, , United Kingdom	2013-08-30
Audrey Taylor	Cambridge, Eng, United Kingdom	2013-08-30
Mangala Fernando	London, , United Kingdom	2013-08-30
Ffion Jones	Bishop's Stortford, Eng, United Kingdom	2013-08-30
david morris	pontarddulais, swansea, , United Kingdom	2013-08-30
Paul Clark	Radstock, Eng, United Kingdom	2013-08-30
Stephen Cardwell	Knutsford, , United Kingdom	2013-08-30
L Elly	Leeds, Eng, United Kingdom	2013-08-30
Timothy Webb	Twickenham,	2013-08-30
FIONA KINGDON	Australia	2013-08-30
karen leicester	leeds, , United Kingdom	2013-08-30
Sarah Thomas	Dawlish,	2013-08-30
rebecca brooks	Edinburgh, Sco, United Kingdom	2013-08-30
Susan Williams	Nottingham, , United Kingdom	2013-08-30
Jane Jamieson	Cwmbran, , United Kingdom	2013-08-30
jessica st john	Southend-on-Sea, Eng, United Kingdom	2013-08-30
Keith Muscott	Isle of Anglesey, North Wales,	2013-08-30
Arun Gomes	Birmingham, Eng, United Kingdom	2013-08-30
Sandra Wilkinson	Huddersfield, , United Kingdom	2013-08-30
D Vaughan	Wirral,	2013-08-30
lauren paton	Coventry, Eng, United Kingdom	2013-08-30
Ryan Dear	Plymouth, , United Kingdom	2013-08-30

<b>Name</b>	<b>Location</b>	<b>Date</b>
Ivor Pillar	Kilkeel, Nor, United Kingdom	2013-08-30
SJ Bradburn	Oakham, Eng, United Kingdom	2013-08-30
Edward Mardell	Epworth, Eng, United Kingdom	2013-08-30
Róisín Henderson	Dunfermline, , United Kingdom	2013-08-30
Anne-Marie Hewitt	Bromsgrove, , United Kingdom	2013-08-30
Ian Thurgood	Coddenham, Eng, United Kingdom	2013-08-30
jackie glover	manchester, , United Kingdom	2013-08-30
John Marsden	Bath, Eng, United Kingdom	2013-08-30
Sue Wilford	Bath,	2013-08-30
Dee Miller	Bath, United Kingdom	2013-08-31
Laura Nettle	Bath, Eng, United Kingdom	2013-08-31
Gabriella Zatchij	Bath, United Kingdom	2013-08-31
beth cartledge	Bath, Eng, United Kingdom	2013-08-31
sam pierce-walker	Bath,	2013-08-31
Kiera Lutz	Bath , United Kingdom	2013-08-31
Dorne Mitchell	Bath,	2013-08-31
Anna Childs	Sheffield, , United Kingdom	2013-08-31
Alison Ryan	Bath, Eng, United Kingdom	2013-08-31
Kate John	Bath, Eng, United Kingdom	2013-08-31
paul wontner	Bath, Eng, United Kingdom	2013-09-01
DENISE CANNINGS	Bath, Eng, United Kingdom	2013-09-01
Dr Carrie Etter	United Kingdom	2013-09-02
Viviana Pantoja	Santiago, Chile	2013-09-02
Luc Riou	Bath,	2013-09-02
Debbie Cavell	Bath,	2013-09-02
Morgaine Merch Lleuad	Bristol, , United Kingdom	2013-09-02
Alexander Campbell	Bath,	2013-09-03
James Campbell	Bath, United Kingdom	2013-09-03
Simon Little	Bath, Eng, United Kingdom	2013-09-04
Freya Reid	Bath, Eng, United Kingdom	2013-09-04
Rebecca Reid	Bath, Eng, United Kingdom	2013-09-04
Andrew Reid	Bath, Eng, United Kingdom	2013-09-04

<b>Name</b>	<b>Location</b>	<b>Date</b>
Alexander Nettle	Bath, Eng, United Kingdom	2013-09-04
Hana Reid	Bath, Eng, United Kingdom	2013-09-04
Sebastian Reid	Bath, Eng, United Kingdom	2013-09-04
Freddie Reid	Bath, Eng, United Kingdom	2013-09-04
Flossie Ure	Bath, Eng, United Kingdom	2013-09-04
Lizzie Maggs	Bath, United Kingdom	2013-09-04
Ruby Ure	South Stoke, United Kingdom	2013-09-04
omar walsh	Bath, Eng, United Kingdom	2013-09-04
Amanda Trim	Corsham, United Kingdom	2013-09-04
ed meddings	Bath,	2013-09-04
Adrian Plummer	Bath,	2013-09-04
sarah jewell	bath, United Kingdom	2013-09-05
Tom Erickson	Bath, Eng, United Kingdom	2013-09-05
Heather andrews	Bath, Eng, United Kingdom	2013-09-06
jesse mandy	bath,	2013-09-06
S Jones	Bath, Eng, United Kingdom	2013-09-06
emma crudgington	Bath, Eng, United Kingdom	2013-09-06
Claire Davies	Bath, United Kingdom	2013-09-06
Stephen Lawson	Bath,	2013-09-06
Kate Tate	Bath, Eng, United Kingdom	2013-09-06
Andy Parsons	Winsley, , United Kingdom	2013-09-06
Donna O'Brien	Bath, Eng, United Kingdom	2013-09-06
Andrew Keir	Australia	2013-09-06
Jason Edwards	Bath, Eng, United Kingdom	2013-09-07
Alastair Dunlop	bath, , United Kingdom	2013-09-07
Jenkyn Knill	Bath,	2013-09-07
Jenny Coles	Bristol, United Kingdom	2013-09-07
maia richmond-hughes	bristol, United Kingdom	2013-09-07
Andrew Brennan	Bath, United Kingdom	2013-09-07
Terea Stephenson	Bath, Eng, United Kingdom	2013-09-07
Patrick Bradfield	Chichester, , United Kingdom	2013-09-07

<b>Name</b>	<b>Location</b>	<b>Date</b>
frank pieper	Bagamoyo, Coa, Tanzania, United Republic of	2013-09-07
Isabel Owen	Chichester, , United Kingdom	2013-09-07
Alma Tate	Bath, Eng, United Kingdom	2013-09-07
Damian Adams	Bath, Eng, United Kingdom	2013-09-07
Tiana Jacout	bath, United Kingdom	2013-09-07
Alex Morris	Thurso, United Kingdom	2013-09-07
Louise Goodsman	Bath, United Kingdom	2013-09-08
Lesley Kenward	Bath, United Kingdom	2013-09-08
Benjamin Hudson	Bath, United Kingdom	2013-09-08
susan bourne	bath,	2013-09-08
Adrian Hamilton	Bournemouth,	2013-09-08
lesley irish	Bath, Eng, United Kingdom	2013-09-08
Steven Gourley	Bath,	2013-09-08
Jody Wood	Bath, United Kingdom	2013-09-08
jane hellard	Bath, Eng, United Kingdom	2013-09-08
peter adcock	Bath, United Kingdom	2013-09-08
Carl Bennett	Tunstall, United Kingdom	2013-09-09
Pat Ingleton	Upper Westwood, Eng, United Kingdom	2013-09-09
Michael Hamilton	Bath, United Kingdom	2013-09-09
Chris Payne	Southampton, Eng, United Kingdom	2013-09-09
Andrea Edgar	Bath ,	2013-09-09
Lucy Cates	London,	2013-09-09
Lindsay Hiscox	Bath, United Kingdom	2013-09-09
Helen Lindley	Pembroke Dock, United Kingdom	2013-09-09
Kerry Burt	Bath , United Kingdom	2013-09-09
Tim Hilleard	Bath, Eng, United Kingdom	2013-09-09
Louis Campbell	Bath, United Kingdom	2013-09-09
Lisa Jackson	Trowbridge, United Kingdom	2013-09-09
tania Liva	Retford, , United Kingdom	2013-09-09
John Wills	Wellingboro,	2013-09-09
Kevin Smith	Bristol, , United Kingdom	2013-09-09

<b>Name</b>	<b>Location</b>	<b>Date</b>
Jo Swift	Bath, United Kingdom	2013-09-09
Karen Perry	Bristol, United Kingdom	2013-09-09
Andy Garrett	Trowbridge, United Kingdom	2013-09-09
Paul Thatcher	Bath, United Kingdom	2013-09-09
Linda Baker Smith	Bath, Eng, United Kingdom	2013-09-09
Tom Parker	Bath, Eng, United Kingdom	2013-09-09
jon birch	Bath, Eng, United Kingdom	2013-09-09
Ulrika Bruton	Trowbridge,	2013-09-09
Rachel Perry	Bath, , United Kingdom	2013-09-09
Ruth Skinner	London,	2013-09-09
Christian Luca	Cleveland, OH, United States	2013-09-10
Nicola Bancroft	Green End, Westlinton, United Kingdom	2013-09-10
Becky Gruffydd	Lymington, Eng, United Kingdom	2013-09-10
Tony Bellows	St Brelade, , Jersey	2013-09-10
mark linddey earley	Newton Abbot, WV, United Kingdom	2013-09-10
sonia mainstone-cotton	bath, , United Kingdom	2013-09-10
Ta Hobson	London, United Kingdom	2013-09-10
Anna Scrivenger	Corsham, United Kingdom	2013-09-10
Tony Hitchcock	Bath,	2013-09-10
Emma Boden	Bath, United Kingdom	2013-09-10
David Mason	Bath, United Kingdom	2013-09-10
Sue Huntley-Barlow	Barrs Court, Bristol, , United Kingdom	2013-09-10
Gavin Lazarus	Bath, United Kingdom	2013-09-10
Mary Crick	Milton Keynes,	2013-09-10
zena Romano	Channel Islands U.K.,	2013-09-10
Phill Kay	Clutton, Eng, United Kingdom	2013-09-10
Rebecca Colley	Farnham,	2013-09-10
sadie yukon	bath,	2013-09-10
Oliver Embleton	Bath, Eng, United Kingdom	2013-09-10
Nita Dixey-Green	Bath, Eng, United Kingdom	2013-09-10
Colette Duthie	Braine-l'Alleud, Wal, Belgium	2013-09-10
Janet Ludwell	Bath/ Saltford,	2013-09-10

<b>Name</b>	<b>Location</b>	<b>Date</b>
Philips Newman	London, United Kingdom	2013-09-10
Colin Coward	Devizes, , United Kingdom	2013-09-10
Daniel Embleton	Bath, Eng, United Kingdom	2013-09-10
tony morris	London, United Kingdom,	2013-09-10
Derek Collins	LONDON, , United Kingdom	2013-09-10
Tessa Foster	Bradford on Avon, , United Kingdom	2013-09-10
Melinda Foster	Bath, Eng, United Kingdom	2013-09-10
Nicole Lloyd-Foxe	Bath, United Kingdom	2013-09-10
Catherine Ashworth	Bath, Eng, United Kingdom	2013-09-10
Simon Slater-Thomas	Chichester, Eng, United Kingdom	2013-09-10
jeff Thompson	tunbridge wells / bath,	2013-09-10
Hayley Lawrence	Bath, United Kingdom	2013-09-10
Wendy Dewar	Bath, United Kingdom	2013-09-10
David Embleton	Bath, Eng, United Kingdom	2013-09-10
Paul Catchpool	Bath, Eng, United Kingdom	2013-09-10
Alan Rowell	Bath,	2013-09-10
Thelma Gardner	Bath, Eng, United Kingdom	2013-09-10
Robert Waterson	Bath, Eng, United Kingdom	2013-09-10
Nick Obolensky	United Kingdom	2013-09-10
Lesley Bunce	Bath,	2013-09-10
Tim Beadle	Bath, United Kingdom	2013-09-10
Ian Harris	Bath,	2013-09-10
Roger McKerr	Wellow, Eng, United Kingdom	2013-09-10
Alice Harper	Wellow, Eng, United Kingdom	2013-09-10
tom jones	bath, United Kingdom	2013-09-10
Julijana Zappia	Hereford, Eng, United Kingdom	2013-09-10
James Marshall	Nottingham, , United Kingdom	2013-09-10
jonathan solomon	bath,	2013-09-11
Paola Sabriani	Bath, Eng, United Kingdom	2013-09-11
Cyrano Ugarow	Bath, Eng, United Kingdom	2013-09-11
niall morris	Bristol, Eng, United Kingdom	2013-09-11
Liz Morris	Bath, Eng, United Kingdom	2013-09-11

<b>Name</b>	<b>Location</b>	<b>Date</b>
Matthew Beese	London,	2013-09-11
Miles Harris	Wells,	2013-09-11
Miranda Armstrong	Bath,	2013-09-11
Gitte Dawson	Bath,	2013-09-11
David Townsend	Chipping Norton, Eng, United Kingdom	2013-09-11
Jacqueline Burrows	Bath,	2013-09-12
Tamzin Fraser	Bath, , United Kingdom	2013-09-12
Suzanne Clark	Arbroath, , United Kingdom	2013-09-12
vicki marchese	bath,	2013-09-12
Baz Stevens	Yeovil, United Kingdom	2013-09-13
Sophie Janes	Bath,	2013-09-13
Heather Mulgrew	Bath, Eng, United Kingdom	2013-09-13
Jo McKerr	Bath, Eng, United Kingdom	2013-09-13
Alex Price	Bath, Eng, United Kingdom	2013-09-13
Ashley Calvert	Bath,	2013-09-13
Trudy Calvert	bath,	2013-09-13
Dave Calvert	bath,	2013-09-13
Alison Fraser	BATH, , United Kingdom	2013-09-14
michael straw	Bath, Eng, United Kingdom	2013-09-14
Isabel Smetek	Peasedown Saint John, United Kingdom	2013-09-14
Amanda Wylie	Bath, United Kingdom	2013-09-14
Richard Moseley	Wiltshire,	2013-09-14
Michelle Keaney	Ely, United Kingdom	2013-09-14
diane Chappell	Bath, Eng, United Kingdom	2013-09-14
Jane Oliver	Belfast, , United Kingdom	2013-09-14
Billy Blitz	Brighton, Eng, United Kingdom	2013-09-14
Jonathan Fry	Bath,	2013-09-14
Annabel Burnie	Germany	2013-09-14
Clare Tigoglu	Bath, Eng, United Kingdom	2013-09-14
shelley carr	Bath, Eng, United Kingdom	2013-09-14
Venetia Osborne	Bath,	2013-09-14
Leila Moseley	Purton,	2013-09-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Rhian Temblett-Wood	Bath, Eng, United Kingdom	2013-09-14
Ella Richmond	Bradford-on-Avon, United Kingdom	2013-09-14
Christina Sandford	Bath,	2013-09-14
clare spencer	Bath, Eng, United Kingdom	2013-09-14
Clare Thorburn	Bath,	2013-09-14
Penny Smith	BATH,	2013-09-14
elizabeth Lashbrooke	Dawlish, Eng, United Kingdom	2013-09-14
Nick Sinfield	Bath,	2013-09-15
Simon Burrows	Bath,	2013-09-15
Paul Eke	Bath, Eng, United Kingdom	2013-09-15
Gabriel Newman	Bath, United Kingdom	2013-09-15
Cathy Burnie	Emsworth, United Kingdom	2013-09-15
Martin Hobday	Bath, Eng, United Kingdom	2013-09-15
Tara Burton	Bath, Eng, United Kingdom	2013-09-15
Caroline Spencer	Canterbury,	2013-09-15
Rachel French	Sevenoaks,	2013-09-15
Jonathan Spencer	Canterbury, Eng, United Kingdom	2013-09-15
liz hallam	notts, , United Kingdom	2013-09-15
Rachel Ferrario	Bath, Eng, United Kingdom	2013-09-16
Juliet Coles	Bath,	2013-09-16
ben buckley	Bath, Eng, United Kingdom	2013-09-16
Nigel Pooley	Bath,	2013-09-16
Mike Denby	Winchester, Eng, United Kingdom	2013-09-17
Charlie Prince	Bath,	2013-09-17
Daryl Pike	Bath,	2013-09-17
John Murtough	Bath,	2013-09-17
Sumanth Soundararajan	India	2013-09-18
Eira Mithcell	Bath, Eng, United Kingdom	2013-09-18
Emily Wright	Bath, United Kingdom	2013-09-18
rebecca utteridge	Bath, Eng, United Kingdom	2013-09-19
Ali Gatehouse	Bath, Eng, United Kingdom	2013-09-19
Sus Davy	Bath, United Kingdom	2013-09-19

<b>Name</b>	<b>Location</b>	<b>Date</b>
Dennis Nicoll	Bath, Eng, United Kingdom	2013-09-20
Oliver Gould	Bath, Eng, United Kingdom	2013-09-21
Tiffeny Cutts	Bath, Eng, United Kingdom	2013-09-21
Justin Wood	Chippenham, , United Kingdom	2013-09-23
sophie newman	Bath, Eng, United Kingdom	2013-09-24
Mike Vonk	Cheltenham, Eng, United Kingdom	2013-09-24
Sam Tulley	Bath,	2013-09-24
Felicity Pearson	Bath, Eng, United Kingdom	2013-09-25
LOUISE FREEAR	Bath, Eng, United Kingdom	2013-09-25
Michael Rowe	Bath, Eng, United Kingdom	2013-09-25
Clive Rugg	Bath,	2013-09-25
Deborah Rugg	Bath, Eng, United Kingdom	2013-09-25
David Waterstone	Bath,	2013-09-25
Roger Wain-Heapy	Bath,	2013-09-25
Mary Taylor	Birmingham, Eng, United Kingdom	2013-09-25
zena Heyes	Ellesmere, Eng, United Kingdom	2013-09-25
Beryl Crooks	Silverstone,	2013-09-25
Michelle Trewavas	Bath,	2013-09-26
Andy Bolden	Bath, Eng, United Kingdom	2013-09-27
Richard Gilbert	Bath,	2013-09-28
Crispin Simon	Bath,	2013-09-29
Clem Simon	Nottingham, Eng, United Kingdom	2013-09-30
Victoria Tye	Bath, , United Kingdom	2013-09-30
Patrick Wise	Cirencester, United Kingdom	2013-10-03
Michael Stanley	Bath, Eng, United Kingdom	2013-10-06
phil honey	bath,	2013-10-07
Joan Grieveson	Bath,	2013-10-07
Jane Mitchell	Bath,	2013-10-08
H G Bennett	Bath,	2013-10-11
teresa fabian	142 Murray Bridge, Australia	2013-10-12
kathryn fabian	Australia	2013-10-12
Jessica Pike	Bath,	2013-10-13

<b>Name</b>	<b>Location</b>	<b>Date</b>
Sheila Quinn	Bath,	2013-10-13
Jilly Burnford	Bath, Eng, United Kingdom	2013-10-14
Stephany Bardzil	Bath, United Kingdom	2013-10-14
Siobhan Coyle	Bath, United Kingdom	2013-10-14
Robert Bell	London, , United Kingdom	2013-10-15
Trevor Osborne	Bath,	2013-10-15
Jessica Bardzil	Bury, Eng, United Kingdom	2013-10-15
Marcus Coyle	Bath, Eng, United Kingdom	2013-10-15
Helen Carey	Bath, United Kingdom	2013-10-15
Joe Seal	Bath, United Kingdom	2013-10-15
rachel morris	Bath,	2013-10-16
Gerard Ellis	Bath,	2013-10-16
Laura Sebire	Bradford-on-Avon, Eng, United Kingdom	2013-10-16
Ben Henderson	Chippenham, Eng, United Kingdom	2013-10-16
Christina Sim	Bath,	2013-10-16
Simon Sebire	Bath, Eng, United Kingdom	2013-10-16
anthony cataldo	Bath, Eng, United Kingdom	2013-10-16
Carolyn Scriven	Bath,	2013-10-16
John Scriven	Bath, England, United Kingdom,	2013-10-16
Fraser Clark	Mickleton, United Kingdom	2013-10-17
Susan Winter	Bath,	2013-10-18
Sally Bell	Bath, Eng, United Kingdom	2013-10-18
Phil Burner	Bath,	2013-10-19
miriam H. Canchado	Edinburgh, Sco, United Kingdom	2013-10-19
Trent Engelhart	Bristol, , United Kingdom	2013-10-19
Jack Robson	Darlington, , United Kingdom	2013-10-20
Tadeo Corradi	Bath,	2013-10-21
Julie McPhee	Bath,	2013-10-21
caron matchet	Coventry, Eng, United Kingdom	2013-10-21
James McPhee	Midford, United Kingdom	2013-10-22
Helena McPhee	Bath, Eng, United Kingdom	2013-10-22
Mike Tuffs	United Kingdom	2013-10-23

<b>Name</b>	<b>Location</b>	<b>Date</b>
Sophie Laidler	Durham, , United Kingdom	2013-10-24
Christine Hardwick	Bath, Eng, United Kingdom	2013-10-24
Susan Lockert	Bath,	2013-10-25
perry harris	Ba,	2013-10-28
Francis Vaughan	Bath, Eng, United Kingdom	2013-10-29
fernanda mayne	Leatherhead, Eng, United Kingdom	2013-11-03
Karen Warrington	Chew Valley,	2013-11-05
Jane Riley	Bath,	2013-11-05
jill britten	Bristol, Eng, United Kingdom	2013-11-05
Ray Bearman	Bath, Eng, United Kingdom	2013-11-05
Clare Williams	Bath,	2013-11-05
Julia Morris	Bath,	2013-11-05
Mary-Jane Evans	Bath, United Kingdom	2013-11-05
Huw Williams	Bath, United Kingdom	2013-11-05
Diana Rogers	Bath, United Kingdom	2013-11-06
Bethan Angell	Bath, United Kingdom	2013-11-06
jennifer sleep	bath,	2013-11-06
Caroline Wallis	Bristol,	2013-11-06
neil Gibson	Bath, United Kingdom	2013-11-07
melanie da costa	Bath, Eng, United Kingdom	2013-11-08
Charles Jackson	Bath, Eng, United Kingdom	2013-11-09
Richard Heath	Bath,	2013-11-11
Jonathan Bull	Bath,	2013-11-11
Emma Battcock	Hinton Charterhouse, , United Kingdom	2013-11-11
Elizabeth James	Bath, United Kingdom	2013-11-11
Peter Lees	Bath,	2013-11-11
Amanda Relph	Bradford on avon,	2013-11-11
Michelle Root	Bath, United Kingdom	2013-11-11
francesca de monterey	bath, , United Kingdom	2013-11-11
Anita Bradfield	Crewkerne, Eng, United Kingdom	2013-11-11
freddie edge	United Kingdom	2013-11-11
Ian Marlow	Frome, , United Kingdom	2013-11-11

<b>Name</b>	<b>Location</b>	<b>Date</b>
Daniel Barnett	Bath,	2013-11-11
annette smith	bath, United Kingdom	2013-11-11
fleur Hitchcock	bath, United Kingdom	2013-11-11
Harvey Samways	Bath, Eng, United Kingdom	2013-11-11
Emma Rose	Bath, , United Kingdom	2013-11-11
hayley easton-street	London, United Kingdom	2013-11-11
Joanna Taylor	Bath,	2013-11-11
Robert Taylor	Bath,	2013-11-11
Tom Rogers	Bath, Eng, United Kingdom	2013-11-11
Darren Portch	Radstock, United Kingdom	2013-11-11
David Cobley	Bath, Eng, United Kingdom	2013-11-12
Anne Egan	Bath, Eng, United Kingdom	2013-11-12
Anna Gahlin	Bath, , United Kingdom	2013-11-12
Andrew Campbell-Waite	Winscombe, United Kingdom	2013-11-12
angela goodman	London, , United Kingdom	2013-11-12
Grace Hodgkinson	Bath, United Kingdom	2013-11-12
Paul Flint	Bath, Eng, United Kingdom	2013-11-12
Craig Whittock	United Kingdom	2013-11-12
Jack Reynolds	Bath, United Kingdom	2013-11-12
Themah Carolle-Casey	Glastonbury, , United Kingdom	2013-11-12
Julie Barr	Bath,	2013-11-12
Harrison Wilkins	Bath, United Kingdom	2013-11-12
Kayleigh-Anne Starr	Bath, Eng, United Kingdom	2013-11-12
Polly Noble	Paulton, United Kingdom	2013-11-12
Gareth Potter	Bath,	2013-11-12
Becca Jones	bath, United Kingdom	2013-11-12
Sam Goodwin	Bath, Eng, United Kingdom	2013-11-12
Gemma Kauder	Bath, Eng, United Kingdom	2013-11-12
suzy mizrahi	Bath, , United Kingdom	2013-11-12
Neal Scotcher	Bath, Eng, United Kingdom	2013-11-12
Grace Williams	Bath, Eng, United Kingdom	2013-11-12
Danowar Healy	dghu, United Kingdom	2013-11-12

<b>Name</b>	<b>Location</b>	<b>Date</b>
Nathan Gardner	Bristol,	2013-11-12
Ryan Hunter	Bath,	2013-11-12
Chris Wise	Bath, Eng, United Kingdom	2013-11-12
Jamie Horner	Exeter, United Kingdom	2013-11-12
patricia greaves	frome, , United Kingdom	2013-11-12
Alex Little	Melksham, United Kingdom	2013-11-12
Mary Hammett	United Kingdom	2013-11-12
Warren Jones	Bath, United Kingdom	2013-11-12

# Comments

Name	Location	Date	Comment
julia Beardshaw	Bath, United Kingdom	2013-06-02	don't believe BANES council should allow building on greenbelt.
Colin Webb	Bath, United Kingdom	2013-06-03	The Greenbelt around Bath should be sacrosanct as part of the complete entity of beautiful Bath.
Gareth Herincx - @SaveBath	Bath, United Kingdom	2013-06-03	I believe this archaeologically important landscape should be saved for the enjoyment of generations to come - and remain as a habitat for endangered wildlife
Roz Jones	Bath, United Kingdom	2013-06-03	Local resident and historian/archaeologist
Michael Swift	Bath, United Kingdom	2013-06-03	If only Green belt land is available to fulfil Bath's housing needs then proper consideration should be given to other sites - for example the land south of Rush Hill and North West of the A 367 near/opposite the Park and Ride. This does not compromise Southstoke village or start to link it to the City and is well served by a substantial highway with roundabout, linking it easily to local facilities/schools and access to the City.
Snjolaug Swift	Bath, United Kingdom	2013-06-03	I feel that Bath needs to have the entrance and hills for arriving in Bath. This development will over crowd the entrance to a beautiful city.
John Dunn	Bath, United Kingdom	2013-06-03	This is a wonderful part of the Crown of Countryside in which the jewel of Bath is set. It's as important a part of the Heritage city as the city centre.
Pamela Webb	Bath, United Kingdom	2013-06-03	We need to protect the beautiful green belt land around Bath. The city was awarded the World Heritage Site status in recognition of the whole of the city and it's setting in the surrounding countryside. This is what makes the beautiful Georgian city of Bath so special and brings visitors from around the world.
Nicola Freeman	Bath, United Kingdom	2013-06-03	This whole area is already over-populated. This is Green Belt Land and an AONB.
Gareth Evans	Bath, United Kingdom	2013-06-03	As the information says this is a very special place and an amenity for a large number of people . The 800 homes already planned will put a considerable strain on the area. Another 300 could make it intolerable.
Charles Stammers	Bath, United Kingdom	2013-06-04	This is a peaceful and beautiful area (AONB) . Such areas are essential
David Rushgrove	Bath, United Kingdom	2013-06-04	Bath is a truly beautiful city, and as such has been recognised and given a UNESCO status, surrounded by open countryside and discreet 'satellite' villages. It is not an 'urban sprawl'. The proposed development will see these features being eroded, for ever. As a parent of three young adults I also recognise the need for more housing in the Bath area, but I am also aware that there could and should be made better use of existing building and derelict land within the city for the development of housing. Making these sites available would I believe be a much better solution. Let us not destroy the fantastic view from the ancient Wansdyke for ever.
Philip Raby	Bath, United Kingdom	2013-06-04	Because if the wrong decision is made, it will destroy one of the most beautiful villages in the region.
Penny Townsend	Bath, United Kingdom	2013-06-04	AONB have the same protection as National Parks. The decision to include this landscape which acts as a buffer around Bath is a result of targets being imposed and decisions taken which undermine the protection of a World Heritage Site Status.
Robin Ward	London, United Kingdom	2013-06-04	Because Bath is my hometown and this area should be protected

Name	Location	Date	Comment
Pam Piekema	Bath, United Kingdom	2013-06-04	We lived around the corner for 4 years and loved this area instantly. It is an area of exceptional beauty. It would be heartbreaking to see it go. A fundamental loss for all, man and animals. There must be other places between Bath and Bristol where a 300-home development would be more in its place.
Mark van den Akker	Bath, United Kingdom	2013-06-04	The character of the Village and area will be extremely negatively effected by these plans.
Suze Pole	Bristol, United Kingdom	2013-06-04	There is no need to build on this beautiful greenbelt area surrounded by small already under pressure with too much traffic.
Beatrice Hutchison	Bath, United Kingdom	2013-06-04	Because I live very near here and it's beautiful, and I don't want it to be built on!
Teresa Perrett	Bath, United Kingdom	2013-06-04	It is important this piece of countryside remains as it is for wildlife and it's misuse could also seriously jeopardise Bath's World Heritage status.
caroline Cundy	Bath, United Kingdom	2013-06-04	laws have been set to protect our countryside for future generations what gives B&NES council the right to override such important legislation?
Rebecca Collett	Bath, United Kingdom	2013-06-04	Because i live in Southstoke and it would be murderus to do that to one of the most beautiful villages in England
Andrea Parkes	Bath, United Kingdom	2013-06-04	Once it is gone, you cannot get this green belt land back. It is an area of outstanding Natural Beauty. Combe Down is already accomodating a development of 800 new homes on the old Foxhill MOD site, this is enough.
Richard Briggs	Bath, United Kingdom	2013-06-04	The green belt is there for a reason!!!
Margaret Stroud	Bath, United Kingdom	2013-06-04	once built on the countryside is gone forever
Angela Frith	Bath, United Kingdom	2013-06-04	Green Belt and AONB is so important to preserve. Building on them will be irreversible and damaging.
Geoffrey Wheatcroft	Bath, United Kingdom	2013-06-04	The proposed housing development infriges almost all of the government's supposed environmental principles, from loss of green belt to increased traffic to conservation of historic monuments.
Carolyn Sherwood-Dawson	Weston-super-Mare, United Kingdom	2013-06-05	Far too many new houses have been built on our stunning countryside, Bath is a beautiful city and should be preserved. I grew up in Bath and it is an amazing place. Do not spoil it by building more housing!!!
Sarah Lloyd	Australia	2013-06-05	I agree with all the petition words. My family has lived in this area for many years and I know it well and know the sense of community thta is imbued in small vallages. I think sprawling development inhibits identity in places. When people can identify in a prescribed place the sense of community remains in tact with all its associated benifits. Sprawling development encourages sprawling behaviour
Victoria Walters	Bath, United Kingdom	2013-06-05	It is vital that this beautiful piece of Bath's green belt is preserved. Part of what makes Bath so special is the lovely swathe of countryside that surrounds it. It would be a travesty if this was lost. Plus the local infrastructure simply could not cope with the extra traffic.
Stan Frith	Bath, United Kingdom	2013-06-05	It is an area of outstanding natural beauty, it is green belt and it should be preserved for future generations to enjoy. The infrastructure in Bath and especially roads are becoming clogged already without exacerbating the situation further. B&NES councillors are seemingly taking the easy ooption by encroaching onto green belt when, with a bit of ingenuity they could re-develop other sites.
David Costa	Bath BA9 8AX, United Kingdom	2013-06-05	An irreversible and inessential development in a matchless and irreplaceable environment, this irrational proposal can only be driven by misguided and uninformed reasoning.

<b>Name</b>	<b>Location</b>	<b>Date</b>	<b>Comment</b>
Emily Rushgrove	Bath, United Kingdom	2013-06-05	This land is some of the most beautiful in the surrounding area and is of historical significance. For this it deserves to be protected. Furthermore it acts as a boundary between city and country and in for Bath this distinction is a defining feature.
Susan Sherwood	Bath, United Kingdom	2013-06-05	I was born in Bath and was my home for 50 yrs
harriet joynes	New York, NY	2013-06-05	this project is not a good enough reason to ruin this green space - there are better alternatives
Virginia Crawford	Bath, United Kingdom	2013-06-05	I live in this area, and I love it. This development would destroy the natural beauty of the area.
Jill Pizey	Bath, United Kingdom	2013-06-05	It threatens the rare and delicate ecosystem in Horsecombe Valley, the site of over 200 flowering species, some rare butterflies and is the principal foraging area for Greater and Lesser Horseshoe bats in this locality,
Andrew Vowles	Bath, United Kingdom	2013-06-05	This is my city - born and bred - the surrounding countryside is its most precious asset: more so than the 'living museum' that our shabby council has managed to turn it into. Everything in town has been set up for the tourist rather than the residents: don't take the only thing that is left for us residents (i.e. the surrounding beauty of the countryside) away too.
Fiona Gourley	Bath, United Kingdom	2013-06-05	This beautiful area should have the same level of protection as a nation park. There is no national or local imperative that should allow building whilst brownfield sites remain undeveloped. These 300 houses will create a thin end of the wedge for further development and the South Stoke plateau will be lost forever.
Katharine Smith	Shepton Mallet, United Kingdom	2013-06-05	Of course Bath and other crowded cities need adequate housing. Instead of developing over and destroying precious natural habitats that will be lost forever, encourage developers, landlords and homeowners to make the most of existing housing stock by offering better incentives to install renewable energy systems, insulate and bring neglected older buildings up to standard. This way we will tread lightly on our world and preserve it for our children.
Jennifer John	Bath, United Kingdom	2013-06-05	It is agreed Belt, within the AONB and part of the Setting of thenWorld Heritage City of Bath, and is part of the setting of The Wansdyke, a Scheduled Ancient Monument
Michele Peck	Auckland, New Zealand	2013-06-06	Bath was my home 'town' when I lived in the UK, it is one of the most beautiful cities in the UK, don't ruin it!
Helen Geake	Bury St Edmunds, United Kingdom	2013-06-07	Taking this out of green belt will inevitably result in development which will destroy the open landscape context of the Wansdyke. This is an enigmatic and hugely important boundary stretching miles through Anglo-Saxon England, and the bit in question is one of the most important parts, perhaps forming the end of the work of the Men of Somerset. It is the last bit of the western stretch that you can clearly see before its route becomes difficult to trace. We need to keep these strange and beautiful aspects of our past.
Simon Pizey	London, United Kingdom	2013-06-07	Family affected
Sarah Cheshire	Bath, United Kingdom	2013-06-07	.
Daniel McNaught	Bath, United Kingdom	2013-06-07	Need to protect and maintain Green Belt

<b>Name</b>	<b>Location</b>	<b>Date</b>	<b>Comment</b>
Celia Stewart	Bath, United Kingdom	2013-06-07	The proposed plan to build on the Southstoke Plateau will cause irreversible damage for our future generations and the wildlife which lives there. I have seen bats, deer, skylarks and barn owls across the fields in recent weeks. The infrastructure in this area will already groan under the 800 houses planned for Foxhill. The traffic is becoming more of a problem yearly, without this added stress on the roads. This is an area of outstanding beauty which should be preserved for our children. Once it's gone it's gone. The outdoors - the original playstation - is there for all to enjoy. The empty derelict properties in and around Bath should be redeveloped into affordable housing.
B Griffiths	Cwmdu, United Kingdom	2013-06-07	Greenbelt land should not be built on. The wildlife needs space away from humans
hayley holmes	La Goutelle, France	2013-06-07	Bath was my home for many years and it's beautiful surroundings must be respected and preserved... I wish to add my voice to those who also refuse to accept the massacre of such natural beauty for profit... let nature breathe!
Marian Small	London, United Kingdom	2013-06-07	We need our open spaces.
Elya Holmes-Rol	France	2013-06-08	Once it's gone, it's forever... preserve the greenbelt and find another solution for the social housing problem... empty buildings/office blocks etc could be renovated... this would be a start.
Nicolas Rol	France	2013-06-08	Preserve the countryside
Catherine Cubitt	York, United Kingdom	2013-06-08	Historical importance of Wansdyke
J.Louis Pozo	Bath, United Kingdom	2013-06-08	The preservation of the Designated Green Belt, the Costwold AONB, the Wansdyke Ancient Monument, the Unesco World Heritage Site, and local wildlife are ample reasons for the maintenance of the status quo of the "South Stoke Plateau". Furthermore the stated road plans will result in a virtual traffic grid lock in an area already plagued by serious congestion twice a day.
Anne Winpenny	Bath, United Kingdom	2013-06-08	The new government planning laws are resulting in a building free-for-all with a needless loss of countryside that will be lost for ever.
Carol Maltby	Olivebridge, NY	2013-06-08	When I lived in Bath years ago, it was nestled in its Green Belt like a jewel in a crown. To lose this would cause irreparable damage.
Tom Geake	Bath, United Kingdom	2013-06-08	The proposal shows a contempt by HMG for its laws against the urbanisation of AONB and Green belt land. I have a duty to my constituents as a Parish councilor to represent their views. The Localism Act allows Bath to determine what is best for its citizens, but HMG has sent its Inspector to enforce obedience to Downing Street domination.
Ian Sharples	Kirkham, United Kingdom	2013-06-09	Protection of our heritage. So much is being eroded away in our small island, and all in order to line someone's pockets with money. No-one else would be allowed to do this.
Lyle Browning	Midlothian, VA	2013-06-09	How many of these features are left and why do they need to be overshadowed by housing or other intrusive modern elements. The Wansdyke is over 1500 years old. Let it sit in its surroundings and not become a kiddies bicycle obstacle course.
Laura Derry	Bury St Edmunds, United Kingdom	2013-06-09	We need these open spaces! Why not redevelop inner-city spaces?
Yaniola Butt	Dorchester, United Kingdom	2013-06-09	Bath is a beautiful city in an area of outstanding natural beauty & a draw for tourists from all over the world providing an input to the economy it should be preserved at all costs

Name	Location	Date	Comment
Harper Fox	Hexham, United Kingdom	2013-06-09	I know we need new homes. But, please, not here, not when there are so many semi derelict sites in the area that could be redeveloped. Our crowded island's lungs are being closed off one by one and we have to fight for each precious scrap of Green Belt that remains.
MAtt McArdle	Bath, United Kingdom	2013-06-10	I'm against the development of Greenbelt land and especially designated AONBs ON PRINCIPLE first and foremost. If we break these rules what hope is there for any lasting guidelines and regulations? What will stop rife speculation and the wholesale destruction of beautiful areas of our countryside in the name of profit?
Joanna Campbell	Bath, United Kingdom	2013-06-10	Designated Green Belt  # Within the Costwold AONB (Area of Outstanding Natural Beauty)  # Setting for the Wansdyke Scheduled Ancient Monument, which runs along the plateau's northern edge  # A known foraging area for the Greater Horseshoe Bath, one of the UK's most rare species, plus a habitat for endangered skylarks  vvDesignated Green Belt  # Within the Costwold AONB (Area of Outstanding Natural Beauty)  # Setting for the Wansdyke Scheduled Ancient Monument, which runs along the plateau's northern edge  # A known foraging area for the Greater Horseshoe Bath, one of the UK's most rare species, plus a habitat for endangered skylarks  vDesignated Green Belt  # Within the Costwold AONB (Area of Outstanding Natural Beauty)  # Setting for the Wansdyke Scheduled Ancient Monument, which runs along the plateau's northern edge  # A known foraging area for the Greater Horseshoe Bath, one of the UK's most rare species, plus a habitat for endangered skylarks  Why is this important to you? (Optional)
Melanie Jackson	Bath, United Kingdom	2013-06-10	Keeping green belt land green.
Steve Henwood	BATH, United Kingdom	2013-06-10	once it's done it won't be undone, and while we have brownfield sites and empty offices & shops in town [and still-changing economics] we can't afford to lose irreplaceable countryside resources
Richard Warwick	Bath, United Kingdom	2013-06-11	Stoke stoke is nice as it is!
Elizabeth Daniel	Bath, United Kingdom	2013-06-11	Once green belt land has been covered with little boxes, it will be lost for ever.The existing wild life is finding life difficult enough at the moment. With their natural habitats taken and loss of food souces to boot. The way things are going,there will be little for us to preserve for generations to come. If you must build, use brown field sites

<b>Name</b>	<b>Location</b>	<b>Date</b>	<b>Comment</b>
TRUDY HARRISON	Bath, United Kingdom	2013-06-11	The green Belt must be protected for future generations, I do not believe that there is any need in the area to put house's on the green spaces around our city.
peter foster	Bath, United Kingdom	2013-06-11	because we love the green belt fields
Aylet Anderson	BATH, United Kingdom	2013-06-11	This creeping development detracts not only from the surrounding countryside but from the city of Bath itself. A town should have proper boundaries, and in my opinion Bath has already overstepped these
Geoffrey Davis	Bath, United Kingdom	2013-06-11	I live next to this proposed development.
Tania Rodrigues	Bath, United Kingdom	2013-06-11	I live next to the proposed development
Lynda Le Ray	Bath, United Kingdom	2013-06-11	Green Belt
Alison Scott	Bath, United Kingdom	2013-06-11	We desperately need to protect our Greenbelt and especially in such an area of outstanding natural beauty. With a little creative thinking there are other places where new housing, which is needed, can be built without encroaching on our precious countryside.
Narp Nandi	Bath, United Kingdom	2013-06-12	to preserve the natural aspect of the country side and not make it look urban
Patricia Laycock	Frome, United Kingdom	2013-06-12	I know & care about this area very well and feel this is not a good plan. Surely there are better sites for development, indeed you have highlighted MoD Foxhill. this is the sort of area for development not protected areas for wildlife.
Erica Smith	Wellow, United Kingdom	2013-06-12	This is green belt land and should remain so.
Susan Crookes	Bath, United Kingdom	2013-06-12	Because once these beautiful fields are built on they are lost for ever. I know people need housing but please not on green belt. Will all green belt be built on? What will happen to our green and pleasant land? God's creation ruined.
Rachel Jackson	Bath, United Kingdom	2013-06-13	This is a beautiful part of the country which shouldn't be ruined.
james ure	bath, United Kingdom	2013-06-13	I live in the area. An area of outstanding natural beauty. If the plans to build more houses on the Southstoke Plateau goes ahead it will connect the village of Southstoke to what is rapidly becoming 'greater Bath' We will lose yet another village to the current trend of 'suburb conversion' Building on our remaining green land is not an answer to the housing problem. Explore all the other options thoroughly first!
JUDITH WALKER	BATH, United Kingdom	2013-06-14	This piece of land is green belt and should remain as such.
Claire Riou	Bath, United Kingdom	2013-06-14	It is important to protect the countryside and wildlife around Bath for the benefit of future generations. I understand that there is sufficient capacity for development on brownfield sites in the area.
Douglas Milsom	Bath, United Kingdom	2013-06-14	In addition to the potential destruction of vital habitat for any number of species, the despoiling of glorious nature on our doorstep, and potential increased disturbance of the peace, I am more than concerned about the possible devaluation of property in the Sulis Meadows area, increased traffic, noise, pollution and anti-social behaviour. Keep the mess where the place is a mess already - re-develop brown-field sites and leave the green alone.
Amanda Whitelock	Bath, United Kingdom	2013-06-14	There is plenty of brown belt land in Bath use that...leave the beautiful green belt alone!!!

Name	Location	Date	Comment
Rupert Douglas-Bate	Bristol, United Kingdom	2013-06-14	When I come home, I want to come home to a place that feels like home I To see England's green and pleasant land. Added to which we have about 710,000 empty homes are currently empty in England according to the 2012 Empty Homes Stats ! See also <a href="http://www.emptyhomes.com/statistics-2/empty-homes-statistic-201112/" rel="nofollow">http://www.emptyhomes.com/statistics-2/empty-homes-statistic-201112/</a> So, before building new homes we need to make the best of what we've already got and not be wasteful and idle.
MARTIN DAVIS	Bath, United Kingdom	2013-06-15	Once built on the open space will be destroyed for ever. There is no going back'
Steve Rose	Bath, United Kingdom	2013-06-15	We strongly object to the proposed development on the South Stoke Plateau in Bath. We are fortunate to live near this area of outstanding natural beauty on Greenbelt land and wish for this oasis of peace and tranquility to be enjoyed by future generations. Bath is a UNESCO World Heritage Site and it would be a travesty if this development goes ahead.
Anthony Paul	bath, United Kingdom	2013-06-16	I am extremely concerned regarding the proposed loss of this important archaeological site and feel strongly that the green belt should be preserved for future generations.
daniel lloyd	Bristol, United Kingdom	2013-06-16	The South Stoke plateau is a beautiful, wide open space -it is designated Green Belt, an AONB an oasis of 'big sky', close to the city.
anthony freear	Bath, United Kingdom	2013-06-17	Views & Landscape will be ruined forever Greenbelt should remain as just that
Charlotte Obolensky	Bath, United Kingdom	2013-06-17	Separation of Bath from surrounding discrete villages, protection of AONB land: if this ceases to be protected then the designation becomes meaningless
Joanna Livall	Bath, United Kingdom	2013-06-17	I live in Southstoke Road and work in Southstoke Lane. I bought my home and rented my office because of the open space - if I wanted to live in a housing estate I'd go and live in Peasdown
Elaine Lomath	Bath, United Kingdom	2013-06-20	This is a UNESCO site, the only one in this country and therefore needs to be conserved
Bryan Williams	Bath, United Kingdom	2013-06-20	What is the point in having land designated as greenbelt if it is then going to be built on? There is not sufficient local infrastructure in the area, especially as the MOD Foxhill site will soon be developed.
Rachel Wstton	Bath, United Kingdom	2013-06-24	This is an important national monument which must be preserved
Peter Shirley	Bath, United Kingdom	2013-06-24	Bath is a World Heritage city because of its surroundings as well as for the city itself. It is vital that the green belt area is protected, and other land for this level of housing can be found in the locality.
Diana Hopkins	BATH, United Kingdom	2013-06-25	Including this area in the Core Strategy is unsound. The area falls within the designated Green Belt, is within the Cotswold Area of Outstanding Natural Beauty, and is the setting for the important ancient monument of the Wansdyke. This area of land determines where Bath starts at this southern extremity, and so helps to provides the unique setting that contributes to Bath being given the status of UNESCO World Heritage Site.
Magdalen Goodbody	Bath, United Kingdom	2013-06-25	This is an area of outstanding natural beauty, which needs to be protected.
Lola Straw	Bath, United Kingdom	2013-06-27	It's Where we live and is so sad to be ruining our beautiful countryside.
Stefan Perkins	Bath, United Kingdom	2013-06-27	The ruination of an area of outstanding beauty is not justified when there is other brownfield sites in and around Bath. Politicians should hang their head in total shame
David Newman	Bath, United Kingdom	2013-06-28	Need to protect our green spaces and wildlife habitats and develop delelict/industrial sites instead.

<b>Name</b>	<b>Location</b>	<b>Date</b>	<b>Comment</b>
Nancy Coppock	Bath, United Kingdom	2013-07-01	Bath is a World Heritage City that has so many wonderful green spaces. There are many undeveloped brown spaces in Bath that should be developed first. Make space for wildlife and for recreation.
Claire Key	Bath, United Kingdom	2013-07-01	I strongly believe in developing brown field sites within the town and not destroying, the beauty character and ancient monuments outside of the town. The council itself has so much unused land within the town it should be optimising income from this before destroying Bath's open spaces. The government also have a health drive to get people out and walking for health - they cannot do this if they have nowhere with fresh air to walk in!
Richard Agar Ward	Bath, United Kingdom	2013-07-01	This is a beautiful area of land which should not be sacrificed. It is already there for a reason.
Mark Summers	Bath, United Kingdom	2013-07-02	To protect the greenbelt countryside for our future generation and keep the identity of each of the surrounding communities.
Naomi Summers	Bath, United Kingdom	2013-07-02	I live on Sulis meadows and I do not wish for our estate to become a through road that would put the safety of our children at risk.
John Brooke	Bath, United Kingdom	2013-07-02	Our World Heritage City is not just all the Georgian magnificence of Bath Centre but also the setting and the villages around. Please use your influence to stop this planning blunder.
Faye Johnson	Corsham, United Kingdom	2013-07-04	Bath is a unique historic city, let's keep it that way
Sheridan Forbes	Bath, United Kingdom	2013-07-07	It is a piece of land that is used by the people of Bath and surrounding communities to access the countryside. It is important that this remains unspoilt for all people to enjoy. This is a precious historical site set in a protected area of outstanding natural beauty. One of the main reasons people come to visit Bath, a beautiful city surrounded by beautiful countryside.
Ewan Robertson	Bath, United Kingdom	2013-07-07	I would like to protect our green belt. This unique plateau in Bath provides a perfect introduction to both town, on one side and country on the other
Robert Parfitt	Bath, United Kingdom	2013-07-08	Vital to the integrity of Bath and surrounding villages, particularly South Stoke. Save serious damage to one of Britain's most important Saxon monuments from serious damage (any proposed 'safeguards' are spurious and lack realism).
Marie-Claire Oliver	Bath, United Kingdom	2013-07-10	It's beautiful countryside and must remain so. Consider the environmental impact.
Marie-Claire Oliver	Bath, United Kingdom	2013-07-10	It's my city. It's a city of cultural heritage with beautiful landscape. Consider the imbalance with climate change.
Chloe Turner	Symn Lane, United Kingdom	2013-07-11	Please protect this special piece of land.
Helen John	Bath, United Kingdom	2013-07-11	This is my childhood village and to develop this land would mean it was no longer a village at all. It would be subsumed into greater Bath and a beautiful Somerset village would be lost. This would be unforgivable, given the fact that it is an astonishingly beautiful and ancient settlement in an Area of Outstanding Natural Beauty.
Graham Davis	Bath, United Kingdom	2013-07-12	Within Costwold ANOB. Already heavily congested Local roads would come to a standstill at certain times of day
Michael Horton	Bath, United Kingdom	2013-07-12	Being Born, raised & living within a stone's throw of this wonderful place we should do all we can to save it
Deborah Ireland	Bath, United Kingdom	2013-07-15	This is the most beautiful area, it makes little sense to develop this area when the old Fox Hill remains empty. We do not need this development

<b>Name</b>	<b>Location</b>	<b>Date</b>	<b>Comment</b>
Diana Cochran	Bath, United Kingdom	2013-07-16	We need to use the many brown sites before even thinking about green belt and AONB.
Alison Humphries	BATH, United Kingdom	2013-07-16	This is important because it is within a mile of my home. It is a beautiful Green Belt area also of Outstanding Natural Beauty and it is so wrong to disturb the wildlife and peacefulness that we currently enjoy. No one should be allowed to build anything on such precious land.
Stephen Pennock	Bath, United Kingdom	2013-07-17	Preserve the AONB, Green Belt and the non-coalescence of South Stoke and the City of Bath.
Karen Robinson	Bath, United Kingdom	2013-07-17	I live very close to the fields which would be lost with this development. They are very beautiful. Perhaps I extra specially appreciate them because for many years I had a hugely disabling anxiety disorder. Now I have fully recovered and go walking in the countryside whenever I can. We cannot un-build once those fields are lost. Those views in the morning and evening sunlight, the sense of space, the peace, the birdsong are irreplaceable.
Marjorie Bartholomew	Bath, United Kingdom	2013-07-17	Green Belt land should be preserved AT ALL COST for all the stated reasons. Mature trees have already been cut down bordering this land. Obviously the Council's underhand forgone conclusion. This is a designated Area of Outstanding Natural Beauty for very good reasons. Leave our great English Heritage alone for our children & grandchildren and look to other Brown Field & other appropriate sites for building. How dare you blight the face of our precious countryside.
Betty Marsland-Bulley	Bath, United Kingdom	2013-07-17	It is very important because once the greenbelt is gone there will be no getting it back and apart from it being an Area of National Beauty and a wildlife habitat for protected species, it provides food for the population, but when it is gone so will the food.
wendy lambson	Bath, United Kingdom	2013-07-22	There is room enough surely on the old MOD sites. To set a precedent building on green belt is opening the doors to build everywhere, especially since there are other brown field sites in BATH. Also to deprive one of the rare bat species the area to forage is a theft of our wildlife from future generations. Who is it who needs these huses? Given that the MoD are pulling out of BATH, surely people will be moving away as well? The council needs a radical re-think on this.
caroline frances-king	Bath, United Kingdom	2013-07-27	How can building on green-field sites be considered, let alone justified, when there are literally hundreds of empty flats above shops and other properties in Bath that could provide accommodation for single people and families alike?
leann scane	bath, United Kingdom	2013-07-27	we need to protect the green belt around bath any bit of land and they try to build on it its not right and we need to protect the wildlife to .
Nicky Jack	london, United Kingdom	2013-07-27	I spent 5 years in Bath as a student and beyond. Bath has the most beautiful vistas, as a town and with its greenery. That's what makes it such a stunning city. If it all gets swallowed into architecture then it will look too dense and lose a great deal of its special charm and attraction. It would be very sad to see the valuable green belt swallowed up- what about the nature too. Please don't allow the build. Many thanks for reading this. Nicky Jack
Miriam Osner	Leeds, WY	2013-07-28	It is only 4 years since a plan to build 2000 houses on this site was thrown out, and the gov't are already back with another plan for building hundreds of houses on fields which are havens for all kinds of wildlife including skylarks and deer.
Paul Cheshire	Bath, United Kingdom	2013-07-28	Bath is special because of its setting in a valley surrounded by green hills.

<b>Name</b>	<b>Location</b>	<b>Date</b>	<b>Comment</b>
Lindy Platt	Bath, United Kingdom	2013-07-28	Green Belt sites are important to us all and MUST be saved. There are plenty of Brownfield sites and areas containing buildings which have remained empty for years which could be developed/built on and which would improve the environment without encroaching on the countryside. When will people understand and realise the importance of ecology.
Henri Straub	Rotterdam, Netherlands	2013-07-28	My wife grew up there, visited Bath and the region very often. The green belt must stay as it is now.
Andrew Camp	Bath, United Kingdom	2013-07-29	As a professional Geographer and Bathonian, I love the landscape and pre-history of this area which, I believe, should be conserved for future generations and not lost to urban sprawl.
Janet Armstrong	Bath, United Kingdom	2013-07-29	This is a beautiful area of Bath where I frequently take visitors for walks. The MoD site at Foxhill is extensive and proposed building for that site will be pressure on already over crowded roads without starting on beautiful countryside.
Nicola Catchpool	Bath, United Kingdom	2013-07-30	I live in the area and feel that the green land is important to maintain
James Mortimer	Bath, United Kingdom	2013-07-31	The countryside surrounding Bath is extremely important and beautiful, and should not be destroyed for completely unnecessary housing
Lucy Bennett	Hilperton, United Kingdom	2013-07-31	There is enough Brown field land around Bath to develop. The proposed site is beautiful and 300 homes is too invasive.
Naresh Claire	Bath, United Kingdom	2013-07-31	A completely illogical decision to build here. There are plenty of other sites, with better transport links. The destruction of a greenfield site with established habitats would be such a shame for the community of Bath.
Joan Schrecker	Bath, United Kingdom	2013-07-31	Damages green belt/ruins South Stoke as a village. Heavy traffic on Frome Road
Roisin Couzins	Bath, United Kingdom	2013-07-31	This is a very beautiful area and I don't think we need to have houses built on it. Bath Council should concentrate on building on brownfield sites rather than areas of such significance.
Joel Cockhill	London, United Kingdom	2013-07-31	There are plenty of brownfield sites not being fully utilised. Develop them first
Alan Batcheldor	Bathampton, Bath, United Kingdom	2013-08-01	There is no need to massacre any more of our green and pleasant land as there are enough empty residential premises and brown field sites about to satisfy our housing needs.
Anthony Howard	Bath, United Kingdom	2013-08-01	It is surely shameful that outstandingly beautiful rural land close to bath, World Heritage site, and within an Area of Outstanding Natural Beauty, and within the Green Belt should even be being considered for development before every other brownfield and available site has been earmarked for housing. The council own many properties within the City of Bath which are lying empty. Stop the hypocrisy and pursue the development of worthwhile sites, not precious rural beauty.
Mark Bale	Wells, United Kingdom	2013-08-01	I grew up in bath and played extensively in this area as a child
Sylvia Mason	Derby, United Kingdom	2013-08-01	I am against all development on greenfields whilst we have 400,000 plots of banked land and enough brownfield sites to build 1.5 million homes, its insane!
Duncan Hall	Bath, United Kingdom	2013-08-02	It's a designated area of outstanding natural beauty with rare wildlife. There are brown field alternatives that should be pursued first.
Sarah Lynott	Bath, United Kingdom	2013-08-03	I used to live in Southstoke and still live nearby. To overdevelop this area of Bath is to lose the essence of what Bath is and will eventually lead to loss of tourism as well as generally losing a naturally beautiful part of this world that we are very lucky to live in.

Name	Location	Date	Comment
Robbie Tack	Bath, United Kingdom	2013-08-03	I used to live in Southstoke and still live nearby. To overdevelop this area of Bath is to lose the essence of what Bath is and will eventually lead to loss of tourism aswell as generally losing a naturally beautiful part of this world that we are very lucky to live in.
Geoffrey Harris	Lincoln, United Kingdom	2013-08-06	Greenbelt land should be sacrosanct. There are many others areas on which to have housing developments.
Sarah Khouri	Bath, United Kingdom	2013-08-11	We need to protect our beautiful Green Belt from Indiscriminate, profit driven developers.
Jessica Palmer	Bath, United Kingdom	2013-08-12	Brown field sites are better places to build and to live. Nearer to work and improving our cities.
Ced Bufton	Bath, United Kingdom	2013-08-16	The plateau is unique and, once gone, cannot be replaced. Plans for houses are important but there must be a balance - apartments on riverside brown field in preference to little boxes on green belt. Does B&NES support this or just their Crest Nicolson partners?
Hilary Bufton	Bath, United Kingdom	2013-08-16	It would be incredibly short sighted to destroy this AONB with its associated wildlife. This plateau acts as a natural boundary for the City of Bath and it is vital for Bath's World Heritage status that this is preserved.
HILARY ELMS	BATH, United Kingdom	2013-08-16	To ensure that Bath's UNESCO status as a World Heritage Site is not lost, also the threat to the Greater Horseshoe Bat would come into question. I think it is most important to ensure that this part of the green belt is not sacrificed after all it is said to be the lungs of the CITY OF BATH.
Nicky and Alan March	Bath, United Kingdom	2013-08-16	Because this land is a designated Green Belt
Adrian Stenning	Bath, United Kingdom	2013-08-16	Once somewhere is designated as an Area of Outstanding Natural Beauty and is designated Green Belt then that should not be ignored. It is clear that other than the Council taking a difficult decision it is in fact easy to say just build on that. The local roads will not handle the extra load of this and 800 homes on the MOD site.
Graham Wake	San Cristobal de las casas, Mexico	2013-08-16	Jjust spent 2 weeks visiting Bath. Its beauty lies in its situation. To take away its surrounding green areas will eventually destroy it. Its true beauty is in its surroundings. there are many places with architechual wonders but very few in the with the overall beauty of Bath. The need for housing maybe great. But remove this beauty will result in less long term visitors and consequently less jobs with a surplus of people to fill them.
Sophie Bufton	Bath, United Kingdom	2013-08-16	I grew up for over twenty years with this beautiful field as a view from my bedroom window. It is unspoiled and represents for me the beauty of the South West and the natural peace of the British countryside. Not only that, but it has been the trail of countless stunning dog walks; an activity that is really a huge part of the local community. It would be a travesty if this land was ruined.
DIANE SHEARN	Bath, United Kingdom	2013-08-16	It is a part of Bath which I love, & its dear to my heart.The city fathers should not run roughshod over our town, as they have in the past
Greg Dring	Bath, United Kingdom	2013-08-17	Development should go on brownfield sites like the unused MoD Foxhill
mark dustin	Bath, United Kingdom	2013-08-17	I grew up here and learnt to be a naturalist and historian in these very fields . destroy them and i will destroy your life
Claire Dustin	Bath, United Kingdom	2013-08-17	As I was brought up in the country I think it is important to preserve as much as possible for our children.
Lynda & Richard Botwood	Bath, United Kingdom	2013-08-17	There are mass development proposals in and around the Bath area, mostly on green belt land. It is outrageous!
David Stone	Bath, United Kingdom	2013-08-18	AONB and a local running area

<b>Name</b>	<b>Location</b>	<b>Date</b>	<b>Comment</b>
Antoinette Midgley	Bath, United Kingdom	2013-08-18	A second major housing development is proposed here less than a mile from the Foxhill site. There is an extended business at Three Ways studio school. Another housing development is too much for the area.
Carrie Cotterill	Warwickshire, United Kingdom	2013-08-18	I don't believe any Green Belt anywhere should be built upon and should serve its original purpose. Alternative solutions sought. I believe Green Belt is the easy cheaper option and that Brownfield and disused buildings should be the first port of call for any developer. I also believe that whilst we allow building in the Green Belt it takes people further away from places of work.
Stephen Beardshaw	Bath, United Kingdom	2013-08-18	As an AONB this area should not be built upon. Maintaining it in its current state will also avoid Bath's UNESCO World Heritage Site status being withdrawn as it was based upon Bath being contained within a 'bowl' which is approached via the green belt.
Hannah Sullivan	Bath, United Kingdom	2013-08-18	Bath is a beautiful city with stunning countryside so close by, it should not lose this!
Sheila Neill	Bath, United Kingdom	2013-08-18	Because the green belt and AONB should remain sacrosanct
Roz Jones	Bath, United Kingdom	2013-08-19	This part of the Wansdyke has never been fully studied, archaeologically. Neither has the South Stoke Plateau.  Both would be destroyed beyond repair.
Mandy, Charlotte + Ash Bliss	Bath, United Kingdom	2013-08-19	It's an area I enjoy walking on
Jane Gutteridge	Hereford, United States	2013-08-19	We are all custodians of this planet and have a duty to protect it
Kerriane Gauld	Bath, United Kingdom	2013-08-20	Too much natural beauty and habitat will be lost. We need to have less impact on our surroundings.
Tam Rundle	Bradford-on-Avon, United Kingdom	2013-08-20	Greenbelt land must remain greenbelt.
Anna Raven	Ardgour, Fort William, United Kingdom	2013-08-20	Used to live near South Stoke in the 1070s and again between 1994 and 2004 and what made Bath special was the relationship between fine buildings and the surrounding landscape. Now somewhat already ruined but even more important to preserve what is left.
Penny Gallagher	bath, United Kingdom	2013-08-21	I have enjoyed walking my dogs there for years, it is stunningly beautiful & part of the setting that makes Bath unique.
Fred Simon	Bath, United Kingdom	2013-08-21	There are brownfield sites in the middle of Bath that would be more suitable and less damaging. This is needless destruction of the nature.
Elizabeth Matthews	Bath, United Kingdom	2013-08-21	Bath is a World Heritage City, known globally for both the beauty of its architecture and surrounding countryside. The green belt is the lungs of the area and should be protected at all costs. A designated Area of Outstanding Natural Beauty is one for everyone to enjoy and appreciate and to bulldoze it to create 300 modern homes is completely outrageous.
erika Tobiassen	Bristol, United Kingdom	2013-08-21	A green belt is a green belt for a reason.
Ben Garner	Bath, United Kingdom	2013-08-22	A dreadful idea to destroy an area of outstanding natural beauty. You have my support.
Eve Cox	Bath, United Kingdom	2013-08-22	We need to save the green areas!
Kate Best	London, United Kingdom	2013-08-22	We cannot let developers keep destroying precious, irreplaceable countryside.
Val Lyon	Bath, United Kingdom	2013-08-22	It is too close to other urban developments (Fox Hill as mentioned and the new Sainsbury's at Odd Down on the other side of Southstoke. South Stoke stands in the middle and is as yet still intact.

Name	Location	Date	Comment
Callie braz	Bath, United Kingdom	2013-08-22	<p>We do not need any more house to be build in or around Bath.... There are several Office blocks that are standing empty, these can be redeveloped for students, freeing up good houses, re-establishing the community bring pride &amp; respect to these area's again.....</p> <p>Bath is unique, no other city can boast such wonderful historical aspects set in beautiful countryside.</p> <p>We have to protect what we have &amp; enhance it sympathetically without destroying the natural balance.. we have been able to achieve this in the past. lets not be so short sighted to think that this type of development will really help the anyone.</p>
Alan Wright	Bath, United Kingdom	2013-08-22	<p>Bath is a unique city, defined not only by its architecture but also its surroundings. I chose to live in Bath for many reasons, one of which was the easy access to such beautiful spaces as the South Stoke Plateau. I feel equally passionate about providing affordable housing, but Bath is not short of brownfield sites that, with imaginative design solutions, could comfortably support alternative solutions to destroying the increasingly threatened greenbelt.</p>
Alan Bond	Bath	2013-08-23	<p>With the proposed re-development of the Foxhill site, together with this development the additional traffic on Bradford Rd and Ralph Allen Drive would make living in this area an absolute nightmare. It is also an AONB and a greenbelt and needs to be maintained as such. This is simply shifting goalposts to suit. The infrastructure cannot cope.</p>
Penny Hardie	Basingstoke, United Kingdom	2013-08-23	<p>The erosion of green belt land is detrimental to our wildlife and brown field sites can usually be found as a good alternative.</p>
Sarah Bond	Bath, United Kingdom	2013-08-23	<p>We do not have the infrastructure in place to support both the redevelopment of this and the Foxhill sites</p>
Diane Fry	Bath, United Kingdom	2013-08-23	<p>It is an area of outstanding beauty and needs to be left alone for greater horseshoe bat not least to say it is actually 'Green Belt' and so it must stay for our children.</p>
Ann Ridgway	Cropredy, United Kingdom	2013-08-24	<p>Preserving beautiful areas of our country will always be important to me and many others.</p>
Susan Lee	Bath, United Kingdom	2013-08-24	<p>You cannot build on the Wansdyke, where next? Stonehenge?!</p>
Sue Graham-Brown	Bath, United Kingdom	2013-08-24	<p>Because it is a beautiful open space which tips down into the beautiful countryside of Somerset and is home to many species of birds and animals that share this beautiful area with us. We must protect this beautiful area.</p>
Alistair Bradley	Bath, United Kingdom	2013-08-25	<p>It is critical to maintain the green belt and ensure Bath is not a concrete creep. Please save this from greed and protect the future. Beauty is critical to us all</p>
Stuart Seale	Bath, United Kingdom	2013-08-25	<p>As a local who enjoys walking the area regularly I would hate to see the planned desecration of green belt.</p>
Marcus Cooper	Bath, United Kingdom	2013-08-25	<p>I live very close by and love this area, I am also an archaeologist and I have very deep concerns for the fate of the Wansdyke, a fantastic ancient monument that has already suffered severe abuse from development in this area</p>
melvin piemonte	banes, United Kingdom	2013-08-26	<p>i dont want to build another house in odd down</p>
margaret cooper	bath, United Kingdom	2013-08-26	<p>historically important once gone, gone forever</p>
Martin Dee	Bath, United Kingdom	2013-08-27	<p>A promise was made to protect green belt and it should not be broken - a matter of integrity</p>
Pamela Deen	Bath, United Kingdom	2013-08-27	<p>I am concerned about the safety of adding more traffic to an already overworked road network with so many young children around.</p>

<b>Name</b>	<b>Location</b>	<b>Date</b>	<b>Comment</b>
Peter Myers	London, United Kingdom	2013-08-27	Green Belt was not established to build on. It was established to remain Green Belt, for all.
Angela Galpin	BATH, United Kingdom	2013-08-28	It's bad enough having the planned 700+ development on the old MOD site at Foxhill without taking away the greenbelt land nearby as well. Soon we won't have any open spaces left to enjoy walking through and watching nature.
Sean Smith	Bath, United Kingdom	2013-08-29	Brown field sites should absolutely be exhausted before green belt development is even contemplated. There also appears to be significant scope for an increase in the density within existing premises in Bath with a high number of vacant, dis-used properties plainly visible around the city.
Laura Stolper	Bath, United Kingdom	2013-08-29	We need to save the Greenbelt especially in such a beautiful area such as Bath - let's not destroy the countryside
cherry britten	Bristol, United Kingdom	2013-08-29	The countryside around the glorious city of Bath must be protected and remain undeveloped .There are many brownfield sites that with imagination and skill would provide delightful housing within Bath itself and add interest,variety and convenience to the new and existing residents of the city itself
Martin Palmer	Bath, United Kingdom	2013-08-29	The temptation to use green belt rather than brownfield sites is due almost entirely to laziness and poor economics. Once destroyed, such places of nature can never be restored.
Simon Calvert-Jones	Bath, United Kingdom	2013-08-29	Green Belt designation, once allocated, should be preserved from development into perpetuity. If overturned, whether in Southstoke or elsewhere, it will only allow developers to claim the same precedent elsewhere on other protected sites such that the status of Green Belt land will mean nothing and be lost forever. Therefore development must not be allowed on the South Stoke plateau.
Hugh Mackay	Bath, United Kingdom	2013-08-29	AONB should remain sacrosanct
Jo Carter	bath, United Kingdom	2013-08-29	Its beauty peace and tranquility are unquestionably important and essential in our ever growing frenetic lives and its benefits are immeasurable.
Suzie Shaw	United Kingdom	2013-08-29	Why choose an AONB that will effectively create urban sprawl right at the edge of a world heritage city? There must be better sites?
ev davies	bath, United Kingdom	2013-08-29	preserve the beauty of bath
Henry Robin Anderson	Bath, United Kingdom	2013-08-29	It is a further encroachment on Bath's so called green belt. The houses needed can be supplied on former MoD sites and by bringing into use flats above shops and other commercial premises
Julia ADAMS	Bath, United Kingdom	2013-08-29	Green belt land should stay Green, increase the density of proposed brown field sites & make use of all brown land available BEFORE developing green belt especially as it has ANOB status. This countryside is enjoyed by many hundreds of Bath residents on a daily basis & should not be destroyed!
Mrs. June Thomas	Bath, United Kingdom	2013-08-29	Bath is a beautiful, unique city and should not be surrounded by urban sprawl. Green belt should be respected and protected for residents, tourists, future generations and wild life. Once it has been built upon, it is lost for ever. There are other ways of tackling the housing shortage, and I for one have put forward various suggestions.
Charlotte Obolensky	Bath, United Kingdom	2013-08-29	Partly a question of principle (Sweeping aside AONB and greenbelt protections makes them meaningless) and partly a question of saving a beautiful part of Bath's setting from
Sue Wilford	Bath, United Kingdom	2013-08-30	The green space around Bath should be protected for all the residents to enjoy and use for recreation.
sam pierce-walker	Bath, United Kingdom	2013-08-31	The Green Belt is a lovely place to walk all year round

Name	Location	Date	Comment
Dorne Mitchell	Bath, United Kingdom	2013-08-31	There are other options - once this piece of countryside is built over it will be gone for ever.
Kate John	Bath, United Kingdom	2013-08-31	Family in Bath
paul wontner	Bath, United Kingdom	2013-09-01	Exhaust brownfield sites first!
Viviana Pantoja	Santiago, Chile	2013-09-02	Although I am Chilean, I know Bath is the most beautiful city in the whole wide world. I lived there for a year (and I'm currently planning to go back ). One of the reasons dearly love the place is its greenness everywhere. Don't let the rest of the world not see it.
Flossie Ure	Bath, United Kingdom	2013-09-04	I live here and I always walk through that field. Me and my best friend who all so lives in Southstoke, love to walk through that this field with our dogs. I will be very upset if this gets built on.
ed meddings	Bath, United Kingdom	2013-09-05	There are a lot of ex Royal Navy sites available to build on - use them first
Adrian Plummer	Bath, United Kingdom	2013-09-05	The protection of city green belts, in particular my local city, is key to ensuring that urban and rural communities can live successfully together.
Heather andrews	Bath, United Kingdom	2013-09-06	Vital to keep protect green belt especially while there are so many brown field sited. There is huge scope for turning redundant town centre shops into accommodation which will help invigorate town centres.
jesse mandy	bath, United Kingdom	2013-09-06	it is important to keep the country side alive to save our animals, plants, trees and keep englands beauty alive. if we destroy our land there won't be a coutry to live in.
Andrew Keir	Australia	2013-09-07	Because once it's gone, it's gone ... forever! I simply can't believe this would even be contemplated.
Teresa Stephenson	Somerset, United Kingdom	2013-09-07	I love Bath and live in Combe Down
Alma Tate	Bath, United Kingdom	2013-09-07	A beautifull tranquil area for wildlife and walks.
Damian Adams	Bath, United Kingdom	2013-09-07	This is a lovely part of countryside and should stay part of the Green Belt to protect future attempt to increase the belt.
Adrian Hamilton	dorset, United Kingdom	2013-09-08	This is my home town.
Lisa Jackson	Trowbridge, United Kingdom	2013-09-09	Greenbelts were never meant for development. It seems that nothing is sacred when the God of Money rears its ugly head. Money over nature, really? Stop this now. Develop the empty, derelict buildings in the city centre/outskirts, leave the greenbelt alone.....you'll only be breaking the law.
John Wills	Wellingboro, United Kingdom	2013-09-09	so that it does not create a precedent
Linda Baker Smith	Bath, United Kingdom	2013-09-09	To protect the sheer beauty of the landscape
jon birch	bath, United Kingdom	2013-09-09	1. because it's greenbelt 2. because bath is only interesting to visitors if it remains beautiful. 3. roads in and out of bath are congested enough already. 4. south stoke is stunning and should be allowed to remain so.
Nicola Bancroft	Green End, Westlinton, United Kingdom	2013-09-10	Because I value the Green Belt
Phill Kay	Clutton, United Kingdom	2013-09-10	Bath is a great town and shouldn't be spoilt with over-population
sadie yukon	bath, United Kingdom	2013-09-10	are you kidding?
Oliver Embleton	Bath, United Kingdom	2013-09-10	Having lived in Bath many years i know this area well... it would be a travesty to see it built on and should be left as it is.

<b>Name</b>	<b>Location</b>	<b>Date</b>	<b>Comment</b>
Janet Ludwell	Bath/ Saltford, United Kingdom	2013-09-10	Green belt is vital to us all. Protecting and preserving our wildlife, giving us places to relax, walk and find peace. There are many empty building in Bath and other conurbations which should be used fro accommodation before we encroach on our countryside!
Daniel Embleton	Bath, United Kingdom	2013-09-10	Green Belt around Bath needs to be maintained for future generations.
Tessa Foster	Bradford on Avon, United Kingdom	2013-09-10	It is particularly important to protect areas designated as Green Belt or AONB because our dwindling countryside is a significant problem. To build on a protected area weakens the protection assigned to other areas.
Simon Slater-Thomas	Chichester, United Kingdom	2013-09-10	I lived in this area for many years and would be very sad to see it destroyed to produce more housing when there are plenty of brownfield sites around.
Wendy Dewar	Bath, United Kingdom	2013-09-10	Because "Green Belt" is what it means. Stop building on our beautiful natural countryside. Bath doesn't need any more housing, it's already jammed and over crowded.
David Embleton	Bath, United Kingdom	2013-09-10	Protecting Bath's Green Belt.
Paul Catchpool	Bath, United Kingdom	2013-09-10	I live in an area of outstanding natural beauty, surrounded by green fields and some of the best vistas in the country - put simply, I want to keep it that way!!
Robert Waterson	Bath, United Kingdom	2013-09-10	Greenbelt is sacrasanct. There are plenty of empty houses that can be brought up to standard and brown-belt land that can be redeveloped.
Ian Harris	Bath, United Kingdom	2013-09-10	I lived in Bath for 3 years including in Combe Down. Bath is already over-crowded and the precious green spaces need to be preserved. Then there is the principle of building on AONB and Green Belt land...
Roger McKerr	Wellow, United Kingdom	2013-09-10	Because areas such as this surrounding Bath are genuinely special and must be protected for future generations.
Alice Harper	Wellow, United Kingdom	2013-09-10	I am horrified that you are considering blighting such stunning English countryside. If this goes through I will never vote Conservative again.
Julijana Zappia	Hereford, United Kingdom	2013-09-10	We have to presereve our precious green spaces. COnvert unused and unloved buildings instead. Bring life back and do not take it from the living!
jonathan solomon	bath, United Kingdom	2013-09-11	sincerely do not feel that alternative areas for development are genuinely investigated. Easier to erect on green belt than the complexities of other sites. this is not a goo enough reason partic for future generations
Paola Sabriani	Bath, United Kingdom	2013-09-11	It's one of the most stunning landscapes in this area and we have enough developments already going on in the area.
Cyrano Ugarow	Bath, United Kingdom	2013-09-11	I live in this area and walk frequently in the area of the proposed estate. I believe the area is of such beauty that it should not be built upon. I am strongly against this proposal.
Miles Harris	Wells, United Kingdom	2013-09-11	A spectacularly beautiful site that should not be spoiled.
Gitte Dawson	Bath, United Kingdom	2013-09-11	We must protect the identity of South Stoke which, up to now, is a beautiful self-contained village
Tamzin Fraser	Bath, United Kingdom	2013-09-12	We need to protect the green areas around Bath, and this is a special part of Green Belt land.
Jo McKerr	Bath, United Kingdom	2013-09-13	This is a really important issue for me. It is so important to protect out Green Belt and AONB.... Bath must not have the urban sprawl that have so spoiled the character of other cities.
Alison Fraser	BATH, United Kingdom	2013-09-14	Other sites 'brownfield' are available. This area is too beautiful, historic and precious to be built on.

<b>Name</b>	<b>Location</b>	<b>Date</b>	<b>Comment</b>
michael straw	Bath, United Kingdom	2013-09-14	Because this is the most beautiful area and will merge combe down and southstoke as one and there are alternative brown field sites and the UNESCO status is critical.
Richard Moseley	Wiltshire, United Kingdom	2013-09-14	beautiful walking countryside
Diane Chappell	The Shallows, United Kingdom	2013-09-14	Don't want to erode our green belt further
Jonathan Fry	Bath, United Kingdom	2013-09-14	I played on these fields I can still the skylarks singing as I wandered across the fields into the beautiful countryside. An area of land that enables people to escape from our normal humdrum lives. The opportunity to develop this as a protected nature reserve that attracts walkers and nature lovers is the real decision that needs to be made. I hope Banes council does not lack the imagination to simply build on the most available piece of land. I also understand that one of the wealthiest landowners in the area can make more money from selling the land. I hope people do not succumb to greed
Annabel Burnie	Germany	2013-09-14	I visit my uncle every christmas and we go for walks over these fields. Its beautiful there and would be a shame to lose a place of natural beauty to a housing estate
shelley carr	Bath, United Kingdom	2013-09-14	I walk my dog daily there and my children play there.
Venetia Osborne	Bath, United Kingdom	2013-09-14	Having grown up in Bath it is extremely important to me to protect the green belt that surrounds it. I live locally and already there are traffic and congestion issues in this area increased housing will exasperate this.
Rhian Temblett-Wood	Bath, United Kingdom	2013-09-14	I am opposed to the destruction of Green Belt sites.
Claire Spencer	Bath, United Kingdom	2013-09-14	We must protect bath's greenbelt and this area which is designated as of outstanding natural beauty, we must protect the integrity of South Stoke as a village, protect the vital habitat of endangered horseshoe bats and also of the sky larks, stop the potential violation of the ancient wansdyke and maintain the greenbelt ring which contributes to the world heritage status of Bath
Clare Thorburn	Bath, United Kingdom	2013-09-14	Being Green belt land and an AONB should stand for something. Having achieved this status it is our responsibility and that of the council to protect the land from development.
Nick Sinfield	Bath, United Kingdom	2013-09-15	Overkill in this area of bath with already one other development earmarked at MOD
Simon Burrows	Bath, United Kingdom	2013-09-15	We need our green lungs
Caroline Spencer	Canterbury, United Kingdom	2013-09-15	I have frequently walked on this land when visiting friends and relations in Bath. It marks an important distinction between the continuous built up area of the City of Bath and the separate village of South Stoke. Both communities would be greatly diminished by a development which removed this distinction.
Rachel French	Sevenoaks, United Kingdom	2013-09-15	My sister lives very close to this area and we walk there every time I visit. I support the concept of Green Belt, the protection of AONBs and the protection of habitats for endangered species.
Rachel Ferrario	Bath, United Kingdom	2013-09-16	Because I live in the area, as well as the fact that it is a AONB
ben buckley	Bath, United Kingdom	2013-09-16	use non inhabitaed factores and houses before breaking up the green areas
Mike Denby	Winchester, United Kingdom	2013-09-17	I visit Bath often and enjoy the beauty and tranquility of South Stoke village.....this will be ruined by such a development.
Eira Mithcell	Bath, United Kingdom	2013-09-18	To protect a designated area of outstanding beauty
Ali Gatehouse	Bath, United Kingdom	2013-09-20	We love walking our dog here and the green fields so close to the city make Bath such a special place.

Name	Location	Date	Comment
Dennis Nicoll	Bath, United Kingdom	2013-09-20	I have lived close to this threatened area for over fifty years and would utterly detest its despoilment by any housing development.
Oliver Gould	Bath, United Kingdom	2013-09-21	This is an AONB and greenbelt land, please dont screw up Bath. This is non reversable please look at more brown field sites first. Not to mention the effect on traffic and house prices in the area.
sophie newman	Bath, United Kingdom	2013-09-24	not enough jobs in the area to sustain the extra housing, particularly on top of the housing planned for the old MOD site.
Mike Vonk	Cheltenham, United Kingdom	2013-09-24	Developers are determined to build on greenbelt areas and spoil there unique characters to the detriment of local towns such as Bath and Cheltenham depriving future generations of enjoying the green space they provide.
Felicity Pearson	Bath, United Kingdom	2013-09-25	For al the reasons set out by the organisers of this petition
LOUISE FREEAR	Bath, United Kingdom	2013-09-25	It needs to be protected
Michael Rowe	Bath, United Kingdom	2013-09-25	I believe that there are still many options in this country for redevelopment of unoccupied and redundant property which if properly exercised will greatly reduce or remove any need to use greenbelt land.
Mary Taylor	Birmingham, United Kingdom	2013-09-25	Housing should be located on brownfield sites. Preserve greenfield areas for their purpose
zena Heyes	Ellesmere, United Kingdom	2013-09-25	The idea of green belt was developed so that it could be kept as that. It should NEVER be built on.
Andy Bolden	Bath, United Kingdom	2013-09-27	Not only is the land in question Green Belt but it is also part of the Cotswold AONB. The National Planning Policy Framework says that AONBs will be afforded the highest level of protection so for this land to even be considered for housing is a transgression of the NPPF. The development proposals should be thrown out on this basis alone. But this land is Green Belt as well so this should add reinforcement (not that it should be needed) to highest level of protection which it should already be afforded. And alongside there is the Wansdyke, a Scheduled Ancient Monument which was built to defend against invaders from the north. The present day northern invader is the town of Bath so the Wansdyke can revive its historical context in the present day by contuining to be that divsion between town and country.
Victoria Tye	Bath, United Kingdom	2013-09-30	World Heritage site, is this way for a reason, don't flood it with houses before exploring the derelict houses in the city centre! PLEASE ALSO SIGN OTHER PETITION! <a href="http://www.change.org/en-GB/petitions/petitioning-right-honourable-eric-pickles-mp-protect-precious-green-belt-in-weston-bath-from-a-300-home-development" rel="nofollow">http://www.change.org/en-GB/petitions/petitioning-right-honourable-eric-pickles-mp-protect-precious-green-belt-in-weston-bath-from-a-300-home-development</a>
Michael Stanley	Bath, United Kingdom	2013-10-06	We cannot continue building until there is nothing left of the countryside.
phil honey	bath, United Kingdom	2013-10-07	this proposed development would be a tragedy for Bath and the area immediately around. Southstoke would be swallowed into Greater Bath, losing its special character. One of the special things of Bath is the way agricultural land encroaches into the city area ( the fields at Perrymead, and up Bathwick Hill. Southstoke plateau is another of these. The pressure on the infrastructure, particularly the roads, will be massive as a result of these houses.
Joan Grieveson	Bath, United Kingdom	2013-10-07	I am against any green belt development

<b>Name</b>	<b>Location</b>	<b>Date</b>	<b>Comment</b>
H G Bennett	Bath, United Kingdom	2013-10-11	I live next to the proposed Green Belt area, and i am very against green belt land being destroyed for development.
Jessica Pike	Bath, United Kingdom	2013-10-13	I live here and can confirm that there are endangered species living here, including the horseshoe bat and skylark
Robert Bell	London, United Kingdom	2013-10-15	I grew up in South Stoke and now live in a big city. I don't understand how anyone can justify destroying this special countryside.
Jessica Bardzil	Bury, United Kingdom	2013-10-15	I have relatives here and know how beautiful this particular area is, not suitable for major development, such unique ancient landscapes must be protected.
Christina Sim	Bath, United Kingdom	2013-10-16	The countryside is beautiful there and have been for many stunning walks.
Carolyn Scriven	Bath, United Kingdom	2013-10-16	Local resident
John Scriven	Bath, England, United Kingdom, United Kingdom	2013-10-16	I live in the parish of South Stoke. Areas of greenbelt, AONB, the natural habitat for wildlife and the Wandsdyke should not be destroyed. The light pollution would be serious on the south side of Bath. Bath's heritage status could be threatened. Jobs are elsewhere, so the development would be a dormitory and traffic congestion would result.
Sally Bell	Bath, United Kingdom	2013-10-18	This would spoil a beautiful open space close to the city of Bath. We do not want to turn Bath into a sprawling eyesore
Tadeo Corradi	Bath, United Kingdom	2013-10-21	Green Belts are too important for the quality of our lives.
caron matchet	Coventry, United Kingdom	2013-10-21	aonb sites deserve vigorous protection. Decisions made now are irreversible. Our future generations rely upon our generation to preserve the future of our rich and diverse areas of natural beauty. Developments such as this will not relieve the housing crisis but will be catastrophic to the heritage and legacy of wildlife and green spaces. A travesty in the making.
Mike Tuffs	United Kingdom	2013-10-23	As a regular visitor to Bath and Southstoke, I believe the development will be a blight on the landscape and is inappropriate in both size and style for the location.
Susan Lockert	Bath, United Kingdom	2013-10-25	I lived in one of the houses which back onto those fields as a child. I spent happy hours walking in the fields between Midford Road and Southstoke. I re-visited in May of this year and loved it and would hate to see it spoiled by building.
Francis Vaughan	Bath, United Kingdom	2013-10-29	We need to preserve Bath as a World Heritage Site
Karen Warrington	Chew Valley, United Kingdom	2013-11-05	I live in Green Belt. Only 11% of the UK is Green Belt and it needs to be protected. I live in BaNES Green Belt and feel it is important to protect all Green Belt otherwise once it is gone we will never be able to get it back. Green Belt protection is supposed to be the highest protection in the land but BaNES is ignoring this. If Green Belt must be built on then there are surely other areas that will have less of an impact on an AONB, a SAM and European Protected Species habitat.
jill britten	Bristol, United Kingdom	2013-11-05	Green Belt stops conurbations from becoming too big and less sustainable. It protects communities from being joined up together thus losing their identities as we are seeing happening at Whitchurch, Bristol.
Ray Bearman	Bath, United Kingdom	2013-11-05	It's important to safeguard green belt for our grand children.
Caroline Wallis	Bristol, United Kingdom	2013-11-06	I grew up in Bath and my sister still lives there. there are many brown sites that could be develop. green belt should remain green belt - or what is the point of it?

Name	Location	Date	Comment
Melanie Da Costa	Bath, United Kingdom	2013-11-08	We live on the edge of Foxhill in Hawthorn grove and will already see over 700 houses built on the mod site adding more traffic etc. we visit southstoke at least 5 times a week to walk our dog, visit friends or use the village hall. It is a wonderful environment and adds quality to our lives. The schools, and nurseries in Odd down area also use Southstoke as a wonderful environmental resource on their doorstep for some of the most deprived and disabled children in Bath. Take the developers elsewhere. There is enough happening in our area already!!!!
Richard Heath	Bath, United Kingdom	2013-11-11	We need to protect green build and use brown filed sites. There are huge numbers of brownfield sites with developers sitting on land. Force them to sell to give way to housing.
Elizabeth James	Bath, United Kingdom	2013-11-11	I believe the Green Belt around Bath (and other towns) should be preserved, certainly until all brownfield sites have been re-developed. This development is likely to add to traffic on an already busy road. Also I have never understood the objection to so-called "Nimbyism" - if local people don't care about their environment, who will?
francesca de monterey	bath, United Kingdom	2013-11-11	I totally agree that more houses are needed, but no building should take place on Greenbelt land. These areas of open space are just as important as housing for quality of life. there are plenty of brownfield sites available and housing which needs refurbishment to bring up to current standards.
Anita Bradfield	Crewkerne, United Kingdom	2013-11-11	to keep green belt green for wildlife and our children!
Daniel Barnett	Bath, United Kingdom	2013-11-11	I have lived in Bath most of my life and value its beautiful countryside context not just its landmarks.
Emma Rose	Bath, United Kingdom	2013-11-11	Please stop filling in our precious areas of natural beauty, with manmade ugliness.
Anna Gahlin	Bath, United Kingdom	2013-11-12	A main part of what makes Bath so special are its immediate surroundings which should be protected.
Paul Flint	Bath, United Kingdom	2013-11-12	The Greenbelt exists to protect our landscape. Not so the council can eradicate it whenever it suits them.
Julie Barr	Bath, United Kingdom	2013-11-12	I feel very strongly that green belt should be preserved, particularly when brown field sites remain available.
Harrison Wilkins	Bath, United Kingdom	2013-11-12	Shouldnt this be important to everyone?
Gareth Potter	Bath, United Kingdom	2013-11-12	Modernity should never be at the expense of heritage, or natural beauty. The problem isn't that there aren't enough houses, it's that there are too many people, and we need to get the population down, and change our global economic models from ones of business, to versions of population control, and global natural harmony. This is not an unattainable futurist vision, it should be being implemented NOW. Stop being vile. Stop being greedy. And curb your breeding habits.
Sam Goodwin	Bath, United Kingdom	2013-11-12	This area is full of OUTSTANDING beauty. There are plenty of dead grey areas within City Centre limits that need redeveloping
Grace Williams	Bath, United Kingdom	2013-11-12	we need more nature. not more houses!
Chris Wise	Bath, United Kingdom	2013-11-12	I live here, I enjoy the green belt regularly additionally Bath facilities struggle with the massive number of tourists and current residents increasing the city size without increasing investment in infrastructure first is foolish

# **Appendix 3 – Whitchurch Generic letter 1**



**COMMENTS**

We do not think Bath & North East Somerset Council has consulted with Bristol City Council as required by new Planning Guidelines. Bristol City Council agreed unanimously to object to such developments due to use of Green Belt Land and extra traffic as such sites would produce 100% commuters of which 90% would go to Bristol causing further congestion. There is a duty to co-operate within the NPPF and Bath & North East Somerset Council are not doing so with Bristol City Council.

We do not agree with any change of Green Belt here.

CSA 46 Should remain

CSA 47 Should not have Green Belt status removed. Infrastructure cannot cope. Schools full, no employment, no Post Office, no NHS dentist, A37 congested. Development here would be unsustainable and unwanted by Bristol City Council

WH1 We strongly object to this site being on the Alternative Strategic Site. There must be no removal of this land from Green Belt. Bath & North East Somerset Council has already rejected a Planning Application for 300 houses at this site on the grounds of Green Belt, traffic etc so why would this same council now recommend this? WH1 is what stops Whitchurch Village merging with Stockwood and stops urban sprawl. A37 is congested, primary school is full, no post office. This would produce unsustainable development and Bristol City Council do not want it.

WH2 We also strongly object to removal of this land from Green Belt and therefore do not want it put on the Alternative Strategic Site. This land is not only used for agriculture but is the site of the tremendously popular Whitchurch Village Fete. A 37 already congested and Bristol City Council do not want this development.

Throughout the whole process of this Core Strategy, Whitchurch Village was an RA1 village to accept 50 houses over some 20 years.

Now we find we are an RAS and have to take 200 houses. This is a quite unfair burden upon the community

We ask that this figure be reduced significantly to say 50-100 houses to be more in line with other villages and that our status of "edge of Bristol" be removed and reverted to that of all the other named villages. To compensate for this small loss of housing figures other smaller villages might welcome more development for regeneration.

Yours sincerely,

**Email sent by the following respondents:**

#	ID	Title	First Name	Surname
1	427	Mr	Matthew	Wilkes
3	428	Mr	Nathan	Wilkes
2	430	Ms	Susan	Wilkes
8	446	Mr	Alfred Charles	Leonard
9	447	Mrs	June Rosemary	Leonard
7	516	Mr	Tim	Stokes
6	751	Mr	John	Winter
5	2028	Mr & Mrs	P	Gurton
10	4823	Mrs	Pamela	Hartshorne
11	4824	Mr	David	Walker
12	4825	Mr	Ian	Rossiter
13	4826	Mr	Donald	Pearce
14	4827	Ms	Annette	Bishop
15	4828	Mrs	Winifred	Rose
16	4829	Mr	Darren	Pascoe
17	4830	Mr	Jason	Thatcher
18	4831	Mrs	Pamela	Bird
19	4833	Mr	Barrie	Hartshorne
20	4834	Mr	Richard	Tucker
21	4835	Mr	Neil	Head
22	4837	Mr	Graham	Day
23	4838	Ms	Rachel	Davis
24	4839	Mr	Trevor	Hicks
25	4840	Mr	Alec	Cashley
26	4841	Mrs	Cheryl	Cashley
27	4842	Mrs	Julie	File
28	4843	Mrs	Jean	Miles
29	4844	Mr	Phillip	Young
30	4845	Mrs	Pamela	Barrett
31	4846	Mr & Mrs	Keith and Cynthia	Webb
33	4847	Mr	Richard	Nash
32	4848	Mrs	Nola	Wiggins
34	4849	Mr	Barrie	Saunders
35	4851	Mrs	Shirley	Britton
36	4852	Miss	Ruth	Osborne
37	4853	Mr	Allan	Martin
38	4854	Mrs	Trish	Martin
39	4855	Mrs	Joanna	Haywood
40	4856	Mrs	Wendy	Lacey
41	4857	Mrs	Gwendoline	Hill
42	4858	Mr	Darren	Broomfield
43	4859	Mrs	Christine	Saunders
44	4860	Mr	Leonard	Osborne
45	4861	Mrs	Gillian	O'Regan
46	4863	Mr	Stephen	Reynolds
47	4864	Mrs	Pauline	Reynolds
48	4865	Mr	Chris	Gunter-Phillips
49	4866	Mr	Frank	Lewis
50	4867	Mrs	Margaret	Lewis
51	4868	Mr	Andrew	Ford

#	ID	Title	First Name	Surname
52	4869	Mr & Mrs	Terence	Gerrish
53	4870	Mr	Trevor	Hilliar
54	4871	Mr	Keith	Green
55	4872	Mrs	Ann	Willis
56	4873	Mrs	Ann	Edwards
57	4874	Mr	Nicholas	Towe
58	4875	Mrs	Jenny	Eaton
59	4876	Mr	Ian	Greatbanks
60	4877	Mr	Ivan	Murphy
61	4878	Mrs	Samantha	Banks
62	4879	Mr	Gerald	Smith
63	4880	Mrs	Anne	White
64	4881	Mr & Mrs	Brian	Ogborne
65	4882	Mrs	Caroline	Fagnani
66	4883	Mr	David	Wilkins
67	4884	Mr	Geoff	Jones
68	4885	Mr	Michael	Mills
69	4886	Mr	Brian	Worlock
70	4887	Mr	George	Barrett
71	4888	Mrs	Elizabeth	Cox
72	4889	Mr	Michael	Russ
73	4890	Mr	James	O'Connell
74	4891	Mrs	Penny	O'Connell
75	4892	Mr	Michael	Squire
76	4893	Mr	Lionel	Webb
77	4894	Mrs	Ann	Webb
78	4896	Mr	Roland	Howell
79	4898	Mr	Alan	Backwell
80	4899	Mr	Raymond	Stone
81	4900	Mrs	Ann	Leonard
82	4901	Mrs	Tracey	Stevens
83	4902	Mrs	Michelle	Bane
84	4903	Mr	Michael	Shortman
85	4904	Mr	Robert	Blake
86	4905	Mrs	Tina	Blake
87	4906	Mr	David	Foxwell
88	4907	Mrs	Margaret	Foxwell
89	4909	Mr	Geoff	Carpenter
90	4911	Mr	Michael	Campbell
91	4912	Mr	Leonard	Wills
92	4957	Mr & Mrs	Nicholas	Kirk
93	4958	Mr	Justin	Jones
94	4961	Mr & Mrs	Geoffrey	Bishop
95	4966	Mr	Kevin	Parker
96	4967	Mr	Peter	Bryant
97	4968	Mrs	Sharon	Bryant
98	4969	Ms	Lucille	Admanyn
99	4970	Mr & Mrs	Charles	Luker
100	4971	Dr	Claire	Craig
101	4975	Mr	Peter	Cook
102	4976	Mr	John	Pearle

#	ID	Title	First Name	Surname
103	4977	Mr & Mrs	Keith	Barton
104	4978	Mrs	Angela	Lane
105	4979	Mr	Terence	Clark
106	4980	Mrs	Mary	Clark
107	4984	Mrs	Mary	Hauser
108	4985	Mr	Barrie	Hauser
109	4986	Mr	Michael	Nurse
110	4989	Miss	Margaret	Barnes
111	4990	Mrs	Jill	Williams
112	4992	Mr	Andrew	Dunn
113	4994	Mrs	Kim	Dunn

#	ID	Title	First Name	Surname
114	4995	Mr	Neal	Mathias
115	4996	Mrs	Nancy	Mathias
116	4999	Mrs	Susan	Harding
117	5008	Mr	Robert	Taylor
118	5009	Mrs	Sally	Taylor
119	5071	Mr & Mrs	Robert and Rachel	Holley
120	5080	Mr	Michael	Hancorn
4	5152	Mr	Bob	Whitchurch
121	5165	Mr	Greg	Sheil
122	5166	Mrs	Kate	Sheil



# **Appendix 4 – Whitchurch Generic letter 2**

**COMMENTS**

Dear Sir,

**Core Strategy Amendments**

I do not agree with land being removed from Green Belt at Whitchurch Village. The Green Belt is the only thing that stops Whitchurch Village from being submerged in urban sprawl. Your Council should listen to its neighbouring authority, Bristol City Council, who has said categorically that there is no need for such development at Whitchurch. Bristol City Council recognises that such development would be 100% commuters, 90% going to Bristol thus increasing already congested traffic and 10% maybe to Bath.

**The NPPF clearly states that there is a duty to co-operate which clearly B&NES Council have not done with Bristol CC and therefore the Core Strategy is not Spatial.**

CSA 46 Should remain as Green Belt.

CSA 47 This land should not be removed from the Green Belt. Removing it from GB is presumably to make way for housing development which is inappropriate here. The Infrastructure cannot cope. A37 is already congested, primary school oversubscribed, no NHS Dentist or Post Office, very limited local employment all of which render any such development as unsustainable particularly with reference to the first paragraph of this letter. In fact B&NES Planning Committee have recently refused a planning application for 125 houses at this site for the above reasons so it seems illogical therefore that B&NES should seek to remove this land from GB

WH1 This area should not be on the Alternative Strategic Site List. This Green Belt land is the very thing that stops Whitchurch Village from merging with Stockwood forming one big urban sprawl. B&NES has already refused planning for 300 houses at this site so again it seems ludicrous for the Council to now consider releasing this land from GB. Bristol CC have objected to any such development- please see first paragraph above. Infrastructure inadequate- A37 already congested, no Post Office, no NHS Dentist, primary school oversubscribed, no local employment.

WH2 The Green Belt land should not be on the Alternative Strategic Site List. The A37 already at capacity and is unsuitable for all the reasons mentioned above.

These sites are all clearly unsuitable and have more to do with B&NES making up housing numbers for the Core Strategy as can be clearly demonstrated by the Council labelling Whitchurch Village as "edge of Bristol" and allocating 200 houses for a village with only 450 approx homes. No where else has a village of this size been allocated such a large housing figure and the fact remains that Bristol City Council have clearly stated that they do not wish large development on their SE Boundary at Whitchurch Village.

I would expect to see this figure of 200 to be reduced to 50 in line with all the other villages within the Core Strategy (bearing in mind the village has already seen Barratt Homes gain permission for 47 houses already)

Yours sincerely,

**The above letter sent by the following respondents:**

#	Respondent No.	Title	First Name	Surname
1	0810	Mr	Paul	Britten
2	4919	Mrs	Fiona	Penfold
3	4920	Mr	Tony	Smith
4	4921	Mrs	Wendy	Smith
5	4922	Miss	Marianne	Britten



# **Appendix 5 – Whitchurch Generic letter 3**

**COMMENTS**

We do not think Bath & North East Somerset Council has consulted with Bristol City Council as required by new Planning Guidelines. Bristol City Council agreed unanimously to object to such developments due to use of Green Belt Land and extra traffic.

We do not agree with any change of Green Belt here.

CSA 46 Should remain

CSA 47 Should not have Green Belt status removed.

WH1 We strongly object to this site being on the Alternative Strategic Site. There must be no removal of this land from Green Belt. Bath & North East Somerset Council has already rejected a Planning Application for 300 houses at this site on the grounds of Green Belt, traffic etc so why would this same council now recommend this?

WH2 We also strongly object to removal of this land from Green Belt and therefore do not want it put on the Alternative Strategic Site. This land is not only used for agriculture but is the site of the tremendously popular Whitchurch Village Fete.

Throughout the whole process of this Core Strategy, Whitchurch Village was an RA1 village to accept 50 houses over some 20 years.

Now we find we are a RA5 and have to take 200 houses. This is a quite unfair burden upon the community

We ask that this figure be reduced significantly to say 50 100 houses to be more in line with other villages and that our status of "edge of Bristol" be removed and reverted to that of all the other named villages.

Yours sincerely

**The above letter sent by the following respondents:**

#	Respondent No.	Title	First Name	Surname
1	4914	Mrs	Pamela	Melrose
2	4915	Mrs	Lorraine	Greatbanks
3	4916	Mr	Michael	Greatbanks



