

**Core Strategy Proposed Changes  
Comment Form Part 2**

*For official use only:  
Received:  
Acknowledged:  
Respondent No.:  
Representation No.:*

For **guidance** on filling in this form, see note on our website: [www.bathnes.gov.uk/corestrategy](http://www.bathnes.gov.uk/corestrategy)  
Text in blue indicates a hyperlink that will open the relevant document, website or email.

Please return this form to Planning Services by **5pm on 8<sup>th</sup> May 2013** ideally by email to [core\\_strategy@bathnes.gov.uk](mailto:core_strategy@bathnes.gov.uk) or, if you do not have access to email, by post to:  
Planning Policy Core Strategy Changes, B&NES Council, PO Box 5006, Bath, BA1 1JG.

**Part 2: Comments**

- This form must be accompanied by [Part 1 \(Contact Details\)](#)
- Please use a new copy of Part 2 for each Core Strategy change you wish to comment on.
- Please read the [guidance](#) on completing this form which includes:
  - explanations of the key terms;
  - explanations of the Core Strategy process; and
  - information on how to make sure your comment is valid and can be considered.
- The [Schedule of Changes](#), the [Comment Form Part 1](#) and Part 2, and the [Guidance Note](#) can be downloaded from [www.bathnes.gov.uk/corestrategy](http://www.bathnes.gov.uk/corestrategy). Please contact Planning Policy on 01225 477548 if you do not have internet access.
- Supporting evidence can also be attached when submitting your comments (please indicate below).

<b>1. Name or Organisation</b>	Federation of Bath Residents' Associations	<b>2. Respondent Number</b> (if known)	
<b>3. Attachments included with this comment</b> (please list them below):			Yes-/ No
See FoBRA comments on the core strategy – Final dated 6 <sup>th</sup> May 13 – which appear in part 7 below			

4. Do you wish to participate at the Examination Hearings?	Yes / <del>No</del>
If yes, please state why you consider this to be necessary:	
See FoBRA's bullet 3 below ("Brownfield sites must be used before green"). In §1c "The Spatial Vision – What the Spatial Strategy Seeks to Achieve" (sub para 6), the emphasis on use of brownfield sites seems to be being eliminated; whereas in "Strategic Objectives" §1.15 Objective 2, the policy is stated as "making optimum use of brownfield opportunities in meeting housing ....." These statements hardly seem a ringing endorsement for the use of brownfield at all, let alone brownfield before greenfield, as FoBRA's suspicion is that developers will wish to pick off the greenfield sites first. FoBRA will therefore wish to draw this to the attention of the Inspector in person.	

5a. Please state the <b>change reference number</b> here that your comment relates to (comments should only relate to a proposed change listed in the <a href="#">Schedule of Changes</a> , available from the website above):
See 4 above.

**Please note that names and comments will be published.**

5b If your comment relates to a **specific proposed development location** please give the name of the location here:

6. Do you support the change?

Yes / No

*This form continues on the next page*

7. Please state your comment below. It is helpful if you can also state why you consider the change makes the Submitted Core Strategy legally compliant/sound, or not as explained in the [guidance note](#). **In relation to the development locations considered by Council, we welcome comments on both proposed and rejected locations.** *Please expand this box or attach a separate sheet if you require more space.*

#### FoBRA Core Strategy comments

Because of the strictures of the recently introduced National Planning Policy Framework (NPPF), FoBRA is mindful of the absolute necessity for B&NES to have an approved Local Plan in place as soon as possible. Accordingly, FoBRA **supports** the current proposals for change to the draft Core Strategy. This includes the increase in housing numbers (though the build rate to meet it would be well above historic figures for several decades, and therefore actual achievement must be in doubt). However, FoBRA feels strongly that:

- The consequential green belt sacrifices are highly undesirable and should not set a precedent;
- Quite plainly, Bath is due to become even more intensely built-up (and some might say full-up). The Planning Minister has recently suggested that in such circumstances neighbouring conurbations should take the strain and that consultations along these lines should take place in accordance with the Localism Act;
- Brownfield sites must be used before green;
- The necessary infrastructure to go with the new sites (particularly the greenfield) must be provided at the same time as the housing, including arrangements to cope with any associated increase in traffic;
- Although the changes in wording on the subject of the Rec which took place at the Council meeting on 4<sup>th</sup> March seem helpful, eternal vigilance will be required to ensure that excessive development does not take place there and that the Rec's original purpose is kept in mind.

Lastly, FoBRA understands that a "Placemaking Plan", when written, will form an integral part of the Local Plan, alongside the Core Strategy, and that much of the detail of the extra housing provision will be there. As this has not yet been seen, nor does it seem likely to be seen before the Core Strategy consultation deadline on 8<sup>th</sup> May, FoBRA reserves the right to comment on this separately, and expects these comments to be given the same weight by the Council as those above.

R.G.Kerr, Chairman Planning Sub-Committee

Final - 6 May 13

8. Please state the change to the policy or supporting text you are requesting. Please refer to the [guidance note](#) for more details.

See 4 above.

*Please expand this box or attach a separate sheet if you require more space.*



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