

# Bath and North East Somerset Core Strategy

## Proposed Changes Representation Form

(For official use only)

Rec'd:

Ack:

Respondent No:

Please return this form to Planning Services by midnight **21<sup>st</sup> October 2011**.

Email to: [planning\\_policy@bathnes.gov.uk](mailto:planning_policy@bathnes.gov.uk)

Post to: PO Box 5006, Bath, BA1 1JG

**This form has three parts –**

**Part A** – Personal Details

**Part B** – Your representations(s) on the Significant Proposed Changes

**Part C** - Your representation(s) relating to the National Planning Policy Framework.

Please fill in Part A once, and a separate sheet for each representation you wish to make on Parts B and/or C. Please include your name/organisation on each Part used.

The scope and content of representations are limited to issues of soundness and legal compliance; and you are requested to make your representation on this official form. **Please note all comments made on the Core Strategy will be publically available.** A guidance note which explains how to complete this form is available on the Council's website [www.bathnes.gov.uk](http://www.bathnes.gov.uk)

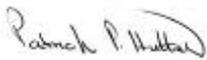
### Part A

#### 1. Personal Details\* 2. Agent's Details (if applicable)

*\* If an agent is appointed, please complete only the Title, Name and Organisation Boxes below but complete the full contact details of the agent in 2.*

Title	Mr	
First Name	Patrick	
Last Name	Hutton	
Job Title (where relevant)	Chairman	
Organisation (where relevant)	Bath Heritage Watchdog	
Address Line 1	PO Box 4252	
Address Line 2	Bath	
Address Line 3		
Address Line 4		
Post Code	BA1 0HX	
Telephone Number		
E-mail Address (where relevant)	chairman@bathheritagewatchdog.org	

Signature



Date 21 October 2011

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

**Name or Organisation:** Bath Heritage Watchdog    **Respondent number (if known):** 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): NPPF1 **Please answer questions 4, 5, 6 and 7**

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input checked="" type="checkbox"/> |
| (2) Effective                       | <input checked="" type="checkbox"/> |
| (3) Consistent with national policy | <input type="checkbox"/>            |

### 6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

**If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.**

#### Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):

**1a** Modern office space and heritage usually don't mix. Too much of one will impact on the other. See the comments on Objective 3 which goes into details. The current practice of influencing office building designs so that they very obviously look like offices is in conflict with expectations that heritage would be of primary importance in a World Heritage Site. Also it is not beyond the capabilities of a good architect to provide a modern interior to a building designed with an exterior to fit comfortably into its surroundings (Churchill House was an excellent example in its time, with Art Deco offices in a Georgian styled shell).

**3.** Clarify that the priority for brownfield sites does not include acceptance of the demolition of existing serviceable buildings. See our comments on 1B and 1C Objective 1 for the details).

**4.** UNESCO recommended a strengthening of the Green Belt around Bath, so the words “general extent” are too loose and suggest a hidden agenda to reduce it.

**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.**

**Change required to make the Proposed Change legally compliant/sound (delete as appropriate):**

Delete the word “modern” from **1a**.

Add “except where existing serviceable buildings have to be demolished” to **3**.

Delete the word “general” from **4**.

**8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part C – Comments on the implications of the National Planning Policy Framework

Please use a separate sheet for each representation

Please note your representation should include the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 9. What does this representation relate to? (please use one item per form)

- Council's response to National Planning Policy Framework (NPPF) number: NPPF1

10. Please give details of why you consider the potential change to the Core Strategy based on the National Planning Policy Framework would not be legally compliant or would be unsound. Please also set out what change(s) you consider necessary to make the Potential Change to the Core Strategy legally compliant or sound. Please be as precise as possible.

Why you consider the Potential Change would not be legally compliant/would be unsound (delete as appropriate):

Bath Heritage Watchdog has responded to the NPPF Consultation explaining exactly why, because it is so badly drafted, the presumption therein in favour of sustainable Development is unsustainable.

This comment might result in some redrafting which would invalidate this proposed wording in the Core Strategy. Suggested wording is:

The overarching strategy of B&NES is to promote sustainable development following the guidance of the National Planning Policy Framework, by:

Note that the earlier objection to the remaining text still applies, see Part B.

11. If you consider that there are other elements of the National Planning Policy Framework (NPPF) that are not addressed by the Council's changes, but that have implications for the soundness of the Core Strategy please provide details here. Please also set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound in light of the NPPF.

12. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): NPPF2 Please answer questions 4, 5, 6 and 7

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

**\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.**

If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input checked="" type="checkbox"/> |
| (2) Effective                       | <input checked="" type="checkbox"/> |
| (3) Consistent with national policy | <input checked="" type="checkbox"/> |

### 6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.

#### Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):

##### The role of Twerton and Newbridge Riversides

Having effectively isolated the two areas you can then assign them differing characteristics or zones. Point **b** should not be advocating or arranging the loss of industrial activity just because it is in the way of other schemes. If it is there and it is trading successfully, the location is a contributory factor to that success and must be respected.

The history of Bath is one of continuous evolution, and the character of any place has evolved because that is what is appropriate. Replacing it with what can only be described as social engineering is likely to do more harm than good, particularly when the Core Strategy bears all the signs of being prepared by those who do not come from Bath and do not understand its character.

**Bath Press.** The building is sound and could be reused, but the current plans are that most of it is to be demolished. Such a demolition represents the loss of approximately 5 acres of industrial premises, which makes unnecessary other reductions of industrial land proposed in the Core Strategy. Even if a change of use is permitted, there seems little justification for destroying the existing structure.

**Roseberry Place** is one of the few current industrial areas that is sufficiently far from residences that it can accommodate virtually any kind of industrial business. Any proposals for this area needs careful consideration because potentially they could cause the export of jobs from Bath. It should not be a key development opportunity for that reason.

**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.**

**Change required to make the Proposed Change legally compliant/sound (delete as appropriate):**

**As original Comment**

**8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part C – Comments on the implications of the National Planning Policy Framework

Please use a separate sheet for each representation

Please note your representation should include the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 9. What does this representation relate to? (please use one item per form)

- Council's response to National Planning Policy Framework (NPPF) number: NPPF2

10. Please give details of why you consider the potential change to the Core Strategy based on the National Planning Policy Framework would not be legally compliant or would be unsound. Please also set out what change(s) you consider necessary to make the Potential Change to the Core Strategy legally compliant or sound. Please be as precise as possible.

Why you consider the Potential Change would not be legally compliant/would be unsound (delete as appropriate):

Bath Heritage Watchdog has responded to the NPPF Consultation explaining that although the stated intention is to withdraw PPS25, the underlying legislation on which PPS25 is based will remain extant, and the summary of the requirements of that legislation in the NPPF is erroneous and therefore unlawful. The draft Core Strategy should not be amended to align with a draft NPPF which will have to be changed to restore the PPS25 description of dependence on Sequential Tests and Exception Tests enshrined in the legislation.

Note that earlier comments objecting to parts of Policy B3 still apply. For avoidance of doubt these are summarised in Part B above, but the full text supplied in the earlier consultation still applies in full.

11. If you consider that there are other elements of the National Planning Policy Framework (NPPF) that are not addressed by the Council's changes, but that have implications for the soundness of the Core Strategy please provide details here. Please also set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound in light of the NPPF.

As the Draft NPPF is not legally compliant, the safest route is to delete the proposed amendment NPPF2 in its entirety

12. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): PC12 Please answer questions 4, 5, 6 and 7

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input checked="" type="checkbox"/> |
| (2) Effective                       | <input checked="" type="checkbox"/> |
| (3) Consistent with national policy | <input checked="" type="checkbox"/> |

### 6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.

#### Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):

The Bristol Avon Local Flood Defence Committee imposed an action in March 2005 for B&NES and the Environment Agency to jointly prepare a Masterplan of the development potential consistent with the flood risk. If that document exists (and a search of the B&NES website suggests that it doesn't) it should be referenced in the Core Strategy. Without such a masterplan there will need to be sufficient flood compensation in each development to offset the additional flood risk posed by that development. It should also be noted that any development outside the flood plain will have water run-off implications for the floodplain and all developments on it, because water always runs downhill.

There have been rumours of unworkable ideas such as mass planting of trees upstream to absorb water, which will create a localised drought in the summer around the planting, and be totally ineffective in November when the trees are dormant and statistically Bath is at its greatest risk of a flood.

Also, in his 1974 report, Frank Greenhalph, who designed and installed the current flood prevention scheme specifically excluded upstream water detention, because the adverse impact on upstream communities would far exceed any marginal benefit to Bath. Because such upstream communities are mostly outside the area administered by B&NES, any scheme supposedly for the benefit of B&NES that creates problems for Wiltshire or Gloucestershire can be expected to be very short-lived.

Equally unworkable is the idea of upstream excavation for storage. At the speed that the Avon runs through Wiltshire during potential flood situations the storage area (assuming it is kept empty in readiness, which is an unlikely condition because potential flood situations are usually preceded by significant rain some of which will fall in or drain into the compensation space), the most likely size of compensation area will fill in less than two hours the first time it is used, and in progressively less thereafter as it gradually fills with silt during every use. It takes considerably longer than that for rain falling 5 miles or more further upstream to get to the (now full) storage location.

In the absence of any Environment Agency endorsed workable mitigation plan, this proposed change is undeliverable.

**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.**

**Change required to make the Proposed Change legally compliant/sound (delete as appropriate):**

The only practical mitigation measure is to increase the volume of water passing through Bath by dredging the river above, through and below Bath, and this has to be a continuous programme because silt is continuously deposited. If B&NES believes it can fund and deliver a regularly dredged river then there is a place in the Core Strategy for a commitment to do so.

Otherwise, it is necessary to delete this entry. It is unworkable, and a policy based on false hope has no place in a legally binding document.

**8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:**

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): PC19 Please answer questions 4, 5, 6 and 7

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input type="checkbox"/>            |
| (2) Effective                       | <input checked="" type="checkbox"/> |
| (3) Consistent with national policy | <input type="checkbox"/>            |

### 6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.

#### Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):

The Statement “Manage the provision of 500-700 new hotel bedrooms to widen the accommodation on offer” is a very poor choice of words. B&NES cannot “manage” this unless it builds and owns the hotels. Otherwise it can only encourage. By restricting the policy to hotels, it rules out other visitor accommodation like self-catering flats, guest houses, caravans, a marina for floating accommodation, or camp sites. Whether there is currently any plans for these is irrelevant, the word “hotel” is specific and rules out other types which might be found to be desirable during the life of the policy.

The development of “a new sports stadium” within the Central Area is impractical, because there is no suitable land. The covenants on the Rec prevent such a construction on that land (and there are plenty waiting to use the courts to enforce those covenants) and there are no other level sites large enough within the Central Area except perhaps the Homebase site which Sainsbury’s have already identified as a location they wish to develop. So as drafted, this objective is undeliverable.

**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.**

**Change required to make the Proposed Change legally compliant/sound (delete as appropriate):**

Replace “hotel bedrooms” with “visitor bed spaces”.

Replace “Central Area” with “City Boundary” to extend the options available.

**8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): PC20 Please answer questions 4, 5, 6 and 7

### 4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

### 6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.

#### Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):

In 10a there is reference to “the Bath Package”. As this is currently an unknown quantity, having not yet been offered for public consultation nor a vote on adoption, it cannot be a commitment in a policy statement. Neither is it necessary because the rest of the policy statement without it does not rule out taking it into account when and if it is adopted.

10d is unworkable and undeliverable. See our comments on PC19.

10e is a meaningless set of words open to misinterpretation. There is no such thing as a Gas Holder Station. Unlike buses and trains, gasholders don’t arrive at a station. It is difficult to see how a Gas Holder Station in the town of Windsor can be relevant to B&NES.

7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.

Change required to make the Proposed Change legally compliant/sound (delete as appropriate):

Delete the words “including the ‘Bath Package’,” from 10a

Delete 10d entirely

Refer to the “Windsor Bridge gas storage and supply installation” in 10e (the gasholder is in use, so the storage element needs to be recognised). There will nevertheless need to be facilities for gas distribution in Bath despite any decommissioning of the current site, so there needs to be a “to be replaced by” statement should accompany the commitment to remove.

8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*



**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.**

**Change required to make the Proposed Change legally compliant/sound (delete as appropriate):**

**Delete 3f in its entirety**

**8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

**Name or Organisation:** Bath Heritage Watchdog    **Respondent number (if known):** 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): **PC28 Please answer questions 4, 5, 6 and 7**

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input checked="" type="checkbox"/> |
| (2) Effective                       | <input checked="" type="checkbox"/> |
| (3) Consistent with national policy | <input type="checkbox"/>            |

**6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.**

**Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):**

The inclusion of the words “and active riverside frontage” limits the locations to a riverbank position. This may prove impractical unless the Homebase site is secured because the facilities described cannot be built on the Recreation Ground (see comment on PC26).

7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.

Change required to make the Proposed Change legally compliant/sound (delete as appropriate):

Delete the words “and active riverside frontage”.

8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

**Name or Organisation:** Bath Heritage Watchdog    **Respondent number (if known):** 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): **PC29 Please answer questions 4, 5, 6 and 7**

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input type="checkbox"/>            |
| (2) Effective                       | <input checked="" type="checkbox"/> |
| (3) Consistent with national policy | <input checked="" type="checkbox"/> |

### 6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

**If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.**

**Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):**

**Is it wise to refer to the Master Plan Supplementary Planning Document (March 2008) when the outline planning permission granted does not meet the constraints within that document?**

**Please see the comments on PC20 about the inadvisability of the expression Windsor Gas Holder Station.**

**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.**

**Change required to make the Proposed Change legally compliant/sound (delete as appropriate):**

**Ideally the planning permission for 06/01733/EOUT granted on 23rd December 2010 should be revoked and a replacement scheme complying with the Master Plan Supplementary Planning Document (March 2008) requested in its place. Failing that the reference to the Master Plan Supplementary Planning Document (March 2008) should be removed because B&NES has already chosen not to enforce it, and now that outline permission has been given, cannot do so as plans for subsequent phases are put forward.**

**Refer to the “Windsor Bridge gas storage and supply installation” in this text.**

**8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): PC31 Please answer questions 4, 5, 6 and 7

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input checked="" type="checkbox"/> |
| (2) Effective                       | <input checked="" type="checkbox"/> |
| (3) Consistent with national policy | <input type="checkbox"/>            |

**6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.**

**Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):**

Whilst there is no objection to the use of Twerton Riverside for multi-use economic development, the implied assumption that industrial use will contract might be unwise. The current economic forecasts are that administrative and retail employment will remain static or reduce, and the only area of growth for the immediate future is in manufacturing. With the loss of over five acres of industrial premises at the Bath Press site, which far exceeds the target for reduction in the current Local Plan, the possibility that demand for industrial premises could increase must have an outlet in Bath. There is no point in building a large number of residences on the Western Riverside if there are no nearby employment opportunities, and the Core Strategy should not foreclose the possibility that employment expansion might require industrial premises. The cross reference to 4 (a iii) is partly acceptable but there is a problem with how that section is worded in this document.. We would prefer the cross reference to be removed for style reasons though: having to find wording elsewhere in a document is bad drafting, and irritating for the reader.

7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.

Change required to make the Proposed Change legally compliant/sound (delete as appropriate):

Replace:

“Its already reduced role as a place for industrial activity will be allowed to contract further subject to the criterion at Part 4 (a) of this policy”

with

“Its currently reduced role as a place for industrial activity will be allowed to expand or contract as necessary to match current and future demand.”

8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): PC32 Please answer questions 4, 5, 6 and 7

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input type="checkbox"/>            |
| (2) Effective                       | <input checked="" type="checkbox"/> |
| (3) Consistent with national policy | <input type="checkbox"/>            |

**6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.**

**Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):**

The wording “Western Riverside will experience a significant uplift in its environmental quality” is gobbledegook.

**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.**

**Change required to make the Proposed Change legally compliant/sound (delete as appropriate):**

**Rewrite it in plain English.**

**8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): PC33 Please answer questions 4, 5, 6 and 7

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input checked="" type="checkbox"/> |
| (2) Effective                       | <input type="checkbox"/>            |
| (3) Consistent with national policy | <input checked="" type="checkbox"/> |

### 6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.

**Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):**

(a iii) should not include a presumption that occupiers could or should be displaced. National policies are to reduce the jobless figure, not to put those already in work at risk of becoming unemployed as a result of ill-conceived policies.

If a business is successful in the Twerton Riverside, then part of that success will be due to the location. Moving a business is expensive, and the cost might make the difference between profit and loss; and a different location may not suit the travel arrangement of all staff leading to the possible loss of expertise. There is also no guarantee that those assessing “suitable alternative provision” will have the skills or knowledge to understand the key drivers of any particular business that keep it viable, and the track record is that they won’t. At least one of the businesses that was asked to move from the Newark Works failed at its new location despite very healthy trade before the move, so it really does beg the question of whether any benefits of alternative uses can really justify the very real risk of the loss of viable businesses and their employment opportunities. Nobody in or near Twerton Riverside would say that it does.

A minor issue, the conventional style of numbering sub-paragraphs would use the style 4 (a) iii. as a hierarchy.

**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.**

**Change required to make the Proposed Change legally compliant/sound (delete as appropriate):**

**(a iii) Proposals for the loss of industrial land and floorspace at Twerton Riverside will be assessed against evidence of current and future demand, with the presumption that existing business which wish to remain will be allowed to do so.**

**8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): PC37 Please answer questions 4, 5, 6 and 7

### 4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

***\*The considerations in relation to the Core Strategy being 'Sound' are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

### 6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.

**Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):**

There is no such address as Larkhall High Street. Nor are all the relevant premises in a single street. Table 4 and Policy CP12 are both wrong.

The district centre commonly known as Moorland Road also includes Shaftesbury Road which contains the centre's largest supermarket and several other shops.

**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.**

**Change required to make the Proposed Change legally compliant/sound (delete as appropriate):**

**Use the correct road names in Larkhall (St Saviours Road and Upper Lambridge Street)**

**Use “Moorland Road and Shaftesbury Road” as the name of the District Centre.**

**8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): PC42 Please answer questions 4, 5, 6 and 7

### 4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

### 6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.

#### Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):

The Government has signed up to the World Heritage Convention and is thereby bound by it and the procedures for protecting World Heritage as defined in the Operational Guidelines. These quotations from the Operational Guidelines document emphasise the importance of World Heritage Sites:

- The cultural and natural heritage is among the priceless and irreplaceable assets, not only of each nation, but of humanity as a whole.
- The loss, through deterioration or disappearance, of any of these most prized assets constitutes an impoverishment of the heritage of all the peoples of the world.
- Parts of that heritage, because of their exceptional qualities, can be considered to be of “outstanding universal value” and as such worthy of special protection against the dangers which increasingly threaten them.

A Local Authority cannot have a policy which undermines the Central Government’s international commitments. Specifically, a local assessment of public benefits cannot take precedence over the Outstanding Universal Value as defined by the World Heritage Committee. Developments which would harm the Outstanding Universal Value must have a strict presumption of refusal regardless of any claimed benefits, unless UNESCO’s UK agents ICOMOS-UK give it their blessing. Bath is preserved for the world, and any public benefit which does not benefit all nations of the world cannot be weighed against preserving the Outstanding Universal Value.

**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.**

**Change required to make the Proposed Change legally compliant/sound (delete as appropriate):**

**Limit this to the first sentence, amended as follows:**

**“There is a strong presumption against development that would result in harm to the Outstanding Universal Value of the World Heritage Site, including its authenticity or integrity, or to the setting of the World Heritage Site, and unless the World Heritage Committee or its UK agents ICOMOS-UK accept that the harm has sufficient offsetting benefits, such developments will be refused.”**

**8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*



**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.**

**Change required to make the Proposed Change legally compliant/sound (delete as appropriate):**

Delete PC43 in its entirety.

**8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): PC44 Please answer questions 4, 5, 6 and 7

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input type="checkbox"/>            |
| (2) Effective                       | <input checked="" type="checkbox"/> |
| (3) Consistent with national policy | <input checked="" type="checkbox"/> |

**6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.**

**Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):**

The idea of enhancing the Outstanding Universal Value needs to be advanced with considerable caution, because the track record of this Local Authority is that their idea of enhancement differed so markedly from the views of the World Heritage Committee that the Committee found it necessary to send a Mission to Bath to investigate its plans. When the Mission recommended a major redesign of the later phases of the Western Riverside, planning decisions ignoring the Mission recommendations were made by the Local Authority. The emphasis must be on conservation rather than improvement, because the Local Authority has shown that it does not understand the Outstanding Universal Value sufficiently to know what would or wouldn't enhance it.

The placemaking plan is incompatible with preserving the obligation to preserve the World Heritage Site and so cannot form part of this section.

**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.**

**Change required to make the Proposed Change legally compliant/sound (delete as appropriate):**

**Delete the last sentence: (The preparation other local development documents, including the Placemaking Plan will ensure the achievement of high quality design.)**

**Amend the sentence before it to:**

**Design that fails to conserve, or enhance the Outstanding Universal Value World Heritage Site to the satisfaction of the World Heritage Committee or its UK agents ICOMOS-UK will be rejected.**

**8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): PC51 Please answer questions 4, 5, 6 and 7

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input type="checkbox"/>            |
| (2) Effective                       | <input checked="" type="checkbox"/> |
| (3) Consistent with national policy | <input type="checkbox"/>            |

**6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.**

**Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):**

These aspirations imply a capability which the Local Authority does not have. The Bath Transport Package as described here does not match the Package as consulted, and the revisions to the package have not yet been offered for public scrutiny, so any reference to the Package is misleading. There is a High Court judgement which rules that the council cannot cherry pick from the existing planning permissions, so a new Package will have to be consulted and new planning permissions sought.

Improvements to the Greater Bristol Bus Network cannot be delivered unless Bristol proceeds with its part of it.

The Local Authority cannot improve the mainline railway, that is the remit of Network Rail.

The public knows nothing of Integrated Transport annual settlement nor Smarter Choices, so these cannot be quoted as though they are defined policies.

7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.

Change required to make the Proposed Change legally compliant/sound (delete as appropriate):

Reword to commit to cooperating with others and stating aspirations., thus:

The Council's Transport Strategy for Bath is one of reducing the use of cars for travelling to and within the city, by progressing improvements to public transport and making walking or cycling within the city an increasingly preferred option for short trips. This will be achieved through a variety of measures including:

- Increased Park & Ride provision and the upgrading of selected bus routes to showcase standard including upgrades to bus stop infrastructure and variable message signs on key routes into the city displaying information about car parking availability
- Co-operation with other authorities to achieve improvements to the bus network through the Greater Bristol Bus Network major scheme including key routes from Bristol and Midsomer Norton,
- Co-operation with Network Rail over improvements to Great Western Railway mainline;
- Co-operation with the operator of the new 15 year GWR franchise (including the Greater Bristol Metro Project) with the aim of increasing the capacity of local rail services travelling through Bath Spa Railway Station, and improving ease of access to and attractiveness of rail travel to and from Bath
- As part of the West of England authorities awarded Local Sustainable Transport Fund key component funding for a number of measures, to submit to the Department for Transport a major bid to the Local Sustainable Transport Fund for £25.5 million
- Creating a more pedestrian and cyclist-friendly city center through the introduction of access changes on a number of streets and expansion and enhancement of pedestrian areas.

8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

## Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. New evidence produced since the Core Strategy was submitted is identified on the Core Documents List.

Name or Organisation: Bath Heritage Watchdog Respondent number (if known): 265

### 3. What does this representation relate to? (one item per form)

Significant Proposed Change (use PC or FPC number): PC52 Please answer questions 4, 5, 6 and 7

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

***\*The considerations in relation to the Core Strategy being ‘Sound’ are explained in Planning Policy Statement 12 and the additional guidance for completing this representation form.***

*If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input type="checkbox"/>            |
| (2) Effective                       | <input checked="" type="checkbox"/> |
| (3) Consistent with national policy | <input type="checkbox"/>            |

### 6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.

**Why you consider the Proposed Change is not legally compliant/unsound (delete as appropriate):**

Again reference to “Windsor Gas Holder Station”. See comments on PC20 for a description of why it is inappropriate.

7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible.

Change required to make the Proposed Change legally compliant/sound (delete as appropriate):

As PC20.

8. Do you wish to participate at the public hearings? If so, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*