

Response to CD12/1  
14<sup>th</sup> March 2014  
Redrow Homes South West  
275  
(DLP Consultants)

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**BATH AND NORTH EAST SOMERSET CORE STRATEGY EXAMINATION**

**RESPONSE TO KEYNSHAM CORE STRATEGY OPTIONS: HIGHWAY  
IMPACT ASSESSMENT FEBRUARY 2014 (CD12/1)**

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1. We note that the Inspector made it clear in his guidance notes (ID/44 and ID45) that his agendas for the forthcoming hearing sessions were intended to structure the discussions at those sessions and were not to be taken as an invitation to parties to make further written responses other than with respect to specifically identified new evidence published by the Council after the November/December consultation. Top of that list of new evidence was the Keynsham Core Strategy Options: Highway Impact Assessment - February 2014 (CD12/1), and it is in respect of that particular new evidence, and Redrow's site at Lays Farm, South West Keynsham, that this written response is made.
2. Clearly, in requiring that the objectively assessed need for market and affordable housing is met in full (Ref: Paragraph 47 NPPF) it is incumbent on LPAs to plan the provision of infrastructure (including highway improvements and travel plan measures and initiatives) necessary to satisfactorily support that level of development in the most sustainable locations.
3. We note, however, that the Core Strategy Options tests do not assume further highway improvements over and above those expected to be delivered in conjunction with the recently approved Somerdale development, with the exception of a new link road connecting Avon Mill Lane and Pixash Lane in association with proposed development to the north of the GWML (Option 4).
4. We also note that no reductions to estimated traffic generations from any of the developments were made to reflect the possible effect of Travel Plan measures or initiatives.
5. The Council has agreed that Redrow's site at Lays Farm South West Keynsham, is capable of delivering 150 dwelling well within the time period to 2022, as adopted in the assessment of options (Ref: Paragraphs 3.5 and 5.5 BNES/53X). We have, moreover, also sought

to demonstrate, through commissioning a detailed Landscape and Visual Appraisal (Ref: CD13/22) and subsequent Photomontages, that this quantum of development could be achieved without unacceptably compromising the purpose of the Green Belt in preventing the merging of Keynsham with Bristol, while preserving the setting of Queen Charlton. The Council's view, which was arrived at prior to examination of the above mentioned photomontages, is that only the eastern part of this site, which has the capacity to accommodate around 50 dwellings *"could be developed without resulting in a narrowing of the Green Belt gap between Keynsham and Bristol, or eroding the gap between Keynsham and Queen Charlton"*, and would represent *"an opportunity to consolidate the edge of Keynsham and could be developed"* (Ref: Paragraph 6.3 BNES/53X).

6. The Council agrees that 50 dwellings on the eastern part of Redrow's site could provide a partial alternative to the proposed site allocation outlined in Policy KE4 (*"around 200 dwellings"*), but not in addition to that site because it says *"the transport evidence indicates that a greater level of development than that proposed in Policy KE4 would have a more serious impact on congestion in the town centre"* (Ref: Paragraph 6.4 BNES/53X); albeit that evidence (Ref: CD12/1) was only published simultaneously with the Statement of Common Ground and consequently not available to us to consider at the time. We note that the Council does not term this impact unacceptable or 'severe' (Ref: Paragraph 32 NPPF).

7. Turning to CD12/1, of the nine 'option scenarios' assessed at 2022, 4 include assumptions about proposed development at South West Keynsham over and above the full build-out of sites K2A and K2B:

Option 1: 200 dwellings  
Option 2: 450 dwellings  
Option 3: 200 dwellings  
Option 8: 1000 dwellings

8. Option 1 reflects the level of development proposed now by the Council at South West Keynsham under Policy KE4 i.e. 200 dwellings; with 250 dwellings as proposed under Policy KA3A to the east of Keynsham.
9. Clearly, the trip generation from an 'alternative' 150 at Lays Farm South West Keynsham and accessed from Charlton Road would have a marginally lesser impact on the network as assessed.
10. Equally, the trip generation from the additional 50 dwellings suggested by the Council at Lays Farm would not be expected to have a materially different impact on the network.
11. Option 2, at 450 dwellings reflects a level of development at South West Keynsham significantly above the level of 250 as currently

proposed by the Council (Policy KE4) and agreed as acceptable in terms of Green Belt impact at Lays Farm, or even 350 (KE4 and Lays Farm at Redrow's proposed level of 150 dwelling). Option 2 also tests a much higher level of development (500 dwellings) east of Keynsham.

12. The impact of more than doubling the assumed level of development at South West and East Keynsham at the same time is described in CD12/1 as "*expected to significantly worsen likely operating conditions in Keynsham in both peak periods.*" It follows however that the impact associated with the addition of just 50 or 150 dwellings at Lays Farm, and reducing the additional 250 at East Keynsham, would not have nearly the same impact.
13. Option 3 tests a shift in the balance of development further in favour of East Keynsham, i.e. 600 dwellings (KE3A), and as a consequence produces marginally worse results than Option 2.
14. Options 5, 6 and 7, successively increase the imbalance between South West Keynsham and East Keynsham (i.e. in favour of East Keynsham) to the extent that the report concludes that insofar as Options 6 and 7 are concerned, these levels of development are "*totally untenable*" and would have "*severe impacts on the network*" (Ref: Paragraphs 6.2.7 and 6.2.8 CD12/1).
15. The simple conclusion we draw from this is that, insofar as highway impact is concerned, the level of development assumed for South West Keynsham in Option 2 would be preferable to the above; indeed the Lays Farm development at 150 dwellings would not reach the level of development tested for Option 2.
16. As with policies KE4 and KE3A, we would expect the Placemaking Principles for the proposed development at Lays Farm to include reference to the need to explore the scope for off-site highway capacity improvements, and indeed reduce car-use through Travel Plan measures and initiatives.