

## Bath and North East Somerset Council Draft Core Strategy Representations by Plan Reference: Chapter 3 - Keynsham

### Plan Reference: Chapter 3: Keynsham

**Reference:** 93\10 S

**Respondent:** Highways Agency

**Representation** The Agency notes the congestion issues within Keynsham, and welcomes the aspiration to reduce out  
**(soundness):** commuting. The Agency is concerned about how any improvements to the SRN would be delivered when there is no reference to the SRN within the IDP. Such concerns will be removed if the Council makes changes as per the Agency's representations to 6G and Policy CP13

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 295\5

**Respondent:** Elaine Stirling

**Representation** The old plans should be torn up and the whole thing started from scratch. The "Local plan" is now  
**(soundness):** completely out of date. With the large employer Cadbury gone so many factors have been changed. In addition families have changed and the level of car ownership has increased hugely. Many homes have 2 cars and if children over 17 are resident they seem to all have cars these days as well. A fresh look at everything is required. To encourage people out of cars public transport much be more convenient and flexible.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

### Plan Reference: Paragraph 3.03

**Reference:** 239\2 S

**Respondent:** Keynsham Civic Society

**Representation** Agree with the listed key issues.  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

### Plan Reference: Paragraph 3.04

**Reference:** 239\3 S

**Respondent:** Keynsham Civic Society

**Representation** Agree that Keynsham has received minimal attention in terms of development.  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 3.05**

**Reference:** 239\4 S

**Respondent:** Keynsham Civic Society

**Representation** Agree that the overall image of the Town is poor.  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 3.07**

**Reference:** 239\5

**Respondent:** Keynsham Civic Society

**Representation** Not clear that the key priorities embrace all the key issues identified in 3.03, eg traffic congestion.  
**(soundness):** Would recommend that the 'key priorities' specifically address the individual 'key issues' identified in 3.03.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 3.08**

**Reference:** 239\6

**Respondent:** Keynsham Civic Society

**Representation** Need to add to regenerating the town centre "in keeping with the original historic streetscape".  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 3.12**

**Reference:** 239\7 S

**Respondent:** Keynsham Civic Society

**Representation** Strongly endorse the principles behind this paragraph.  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Keynsham: The Vision**

**Reference:** 180\2

**Respondent:** J S Bloor Ltd

**Representation**

**(soundness):** The Core Strategy is unsound as it does not meet housing needs. The Proposed Changes to the RSS identified the need to alter the general extent of the Green Belt at Keynsham in order to accommodate an urban extension to meet housing needs. The RSS considered that in order to make the necessary provision for new homes and to fulfil the role of the SSCTs in terms of their economic potential which could not be met in the existing urban areas, then the most sustainable solution is to provide for urban extensions to the SSCTs. This was debated at the Regional EIP and was a recommendation of the Panel. To address these exceptional circumstances, the RSS makes changes to the general extent of the Green Belt, removing the designation from the areas required to accommodate the proposed urban extensions.

The Panel considered that Keynsham was a suitable sustainable location for housing development in order to support economic growth in the Bath TTWA. Keynsham was considered as a suitable location as it would allow development to serve the wider needs of the conurbation. The Panel considered that Keynsham can provide a wide range of community services for new development and that it would be an attractive location for associated employment development. The combination of these factors makes Keynsham a sustainable location. The Panel considered that there was sufficient scope for development around Keynsham to allow development to proceed without threatening the integrity of the separation that the Green Belt ensured. This was endorsed by the Secretary of State in the Proposed Changes to the RSS. The Secretary of State agreed that Keynsham has a strong functional relationship with Bristol and forms part of the Bristol SSCT. It was considered that there were opportunities at Keynsham both for housing and employment to strengthen its role, so it could better serve its own population and that of the surrounding area.

The vision for Keynsham should, as part of the vision for BANES be in general conformity with the RSS (albeit that it is the Interim RSS i.e. the former RPG10 of September 2001 that is the RSS in the absence of the latest RSS being finally adopted). The need to critically review the Green Belt, to examine whether boundary alterations were needed to allow for long term sustainable needs was set out in the Interim RSS. The evidence base of the latest RSS is a material consideration. Clearly the vision is not in general conformity with the RSS, as the Core Strategy has not reviewed the Green Belt in the context of making provision for long term sustainable development needs for an urban extension to Keynsham for 3,000 dwellings. The latest 2008 based household projections also endorse the need for provision to be in sustainable locations.

The Economic Strategy for Bath and North East Somerset 2010 – 2026 states that the Green Belt around Keynsham has led to out commuting. In order to maintain Keynsham as a viable, sustainable market town there is an urgent need to build on its strategic location and transport links to expand and diversify the employment base. This would help to reduce out commuting and replace some of the jobs lost at Cadbury. The Economic Strategy states on page 41 that:  
“The future use of the Somerdale site will be critical to the future of Keynsham and the action plan places emphasis on developing employment on this site. A targeted inward investment plan should be put together for Keynsham in order to raise its profile and as a future potential alternative office location to Bristol, as the area has good transport links and the strategic employment site of Somerdale.”

The Action Plan in the Economic Strategy sets out priorities for 2010 – 2013 and listed for Keynsham is: “Bring forward new employment space in Keynsham town centre and at Cadbury Somerdale”, the action was to bring forward a Regeneration Delivery Plan covering Keynsham Town Centre and Cadbury Somerdale, the output is listed as development of the centre which could deliver 10,000sqm of office space, 1,000sqm retail space, 2,000 sqm leisure and community space and up to 600 new and relocated jobs. Given Keynsham’s acknowledged suitability as a sustainable location for housing development in order to support economic growth in the Bath TTWA, it is not clear what the justification is for developing housing on part of the Somerdale employment site. This location is a suitable employment location and Keynsham in the Economic Strategy has been identified as an alternative location to Bristol for office development. The Somerdale site falls within Flood Zone 2 and yet is expected to accommodate 600 dwellings. The SFRA has also identified that part of the area is subject to increased risk from climate change. The loss of employment land at Somerdale will not support the self containment of Keynsham and will lead to a further imbalance between housing and employment provision. On this basis an objection is made to the use of the Cadbury Somerdale site for residential development. Given the above land at south west Keynsham is considered to be suitable, available and deliverable.

Development south west of Keynsham would not compromise the principles of the Green Belt. Keynsham as a market town should be the focal point for locally significant development including the provision of the bulk of district housing provision outside the Bath SSCT and also taking into account Bristol SSCT, thereby increasing its self containment. Bloor Homes consider that land to the south west of Keynsham provides the best opportunity to accommodate future housing needs. This area would not lead to the coalescence of Keynsham with Saltford. The area is not constrained by flood plain or conservation area, but is within the Landscape Character Area subject to Policy NC1, this is however a local designation. Bloor Homes consider that land to the south west of Keynsham is suitable for an urban extension to meet local needs. The Bloor land control extends to approximately 55.94 hectares which sits between Charlton Road and Parkhouse Lane to the north and Redlynch Lane to the south. The capacity of the site is approximately 1,000 dwellings assuming 60% is developed for residential use. (Representations including a Site Location Plan were submitted in response to the Spatial Options Consultation in January 2010.)

**Change sought to** 7b Change required to make the Core Strategy sound:

**make sound:** The Core Strategy should be amended to reflect the latest published household projections in accordance with PPS 3 paragraph 33 so that provision is made for in the order of 18,500 dwellings and the general extent of the Green Belt is redefined at Keynsham so that land south west of Keynsham is removed from the Green Belt and development needs can be accommodated sustainably in accordance with national guidance. Changes would need to be made to Policy DW01 to increase the housing provision for the plan period to at least 18,500 dwellings. Changes would need to be made to the spatial vision for Keynsham and also to Policy KE1 to reflect the strategic location and the need to make provision for 3,000 dwellings instead of 1,500 dwellings at Keynsham. Policy KE1 would also need to define the general extent of the Green Belt by removing land to the south west of Keynsham from the Green Belt. See proposed changes to Policy KE1

**Representation (legal compliance):** 6a Why you consider the Core Strategy is not legally compliant:

The Core Strategy is not legally compliant as it is not in general conformity with the development plan as set out in PPS 12 paragraph 4.50 i.e. it should conform generally to the Regional Spatial Strategy, which in the South West is the Interim RSS i.e. the former RPG 10. The evidence base for the latest version of the RSS i.e. the Secretary of State’s Proposed Changes should be considered as a material consideration.

The Core Strategy is not legally compliant as it fails in to make adequate provision for housing needs during the plan period. It does not conform to latest Government guidance in terms of the latest evidence base for the SW RSS or the latest DCLG 2008 based household projections. The Councils own Strategic Housing Market Assessment indicate that there is a very high housing need, both in household growth and in relation to likely total future supply.

**Change sought to make legally compliant:** 7a Change required to make the Core Strategy legally compliant:

The Regional Spatial Strategy remains part of the development plan, despite the Coalition Government announcing that the RSS was to be abolished. The 6th July 2010 revocation of Regional Strategies was announced with immediate effect. The 6th July revocation decision was then subject to challenge in the Cala Homes (South) Ltd case. The effect of the Cala Homes decision was that the Regional Strategy as it stood on 5th July forms an ongoing

part of the development plan. PINs Advice confirms that the RS is part of the development plan until legislation to formally repeal or revoke the RSS is implemented. The Core Strategy should be consistent with the development plan and the latest national advice, which now includes the DCLG 2008 based household projections. In the South West the Regional Strategy remains part of the development plan and in this case that is RPG10 September 2001 which became the Interim RSS in 2004. The Core Strategy does not conform to the Regional Spatial Strategy and no local justification is provided for the lack of conformity. The housing figures for the plan period should be increased to at least 18,500 dwellings.

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**Reference:** 275\6

**Respondent:** Redrow Homes (South West) Ltd.

**Representation** The Core Strategy is unsound as it does not meet housing needs.

**(soundness):**

The Secretary of State's Proposed Changes to the RSS in 2008 identified the need to alter the general extent of the Green Belt at Keynsham in order to accommodate an urban extension of 3,000 dwellings to meet housing needs. The RSS considered that in order to make the necessary provision for new homes and to fulfil the role of the SSCTs in terms of their economic potential which could not be met in the existing urban areas, then the most sustainable solution is to provide for urban extensions to the SSCTs. This was debated at the Regional EIP and was a recommendation of the Panel. To address these exceptional circumstances, the RSS makes changes to the general extent of the Green Belt, Bath and North East Somerset's Core Strategy – Publication Stage Representation Form removing the designation from the areas required to accommodate the proposed urban extensions.

The Panel considered that Keynsham was a suitable sustainable location for housing development in order to support economic growth in the Bath TTWA. Development at Keynsham would serve the wider needs of the conurbation. The Panel considered that Keynsham can provide a wide range of community services for new development and that it would be an attractive location for associated employment development. The combination of these factors makes Keynsham a sustainable location. The Panel considered that there was sufficient scope for development around Keynsham to allow development to proceed without threatening the integrity of the separation that the Green Belt ensured.

This was endorsed by the Secretary of State in the Proposed Changes to the RSS. The Secretary of State agreed that Keynsham has a strong functional relationship with Bristol and forms part of the Bristol SSCT. It was considered that there were opportunities at Keynsham both for housing and employment to strengthen its role, so it could better serve its own population and that of the surrounding area.

The vision for Keynsham should, as part of the vision for BANES be in general conformity with the RSS (albeit that it is the Interim RSS i.e. the former RPG10 of September 2001 that is the RSS in the absence of the latest RSS being finally adopted. RPG 10 set out the need to critically review the Green Belt and to examine whether boundary alterations were need to allow for long term sustainable needs. The evidence base of the latest RSS is also a material consideration as it sets out the exceptional circumstances.

Clearly the vision is not in general conformity with the RSS, as the Core Strategy has not reviewed the Green Belt in the context of making provision for long term sustainable development needs. The latest 2008 based household projections also endorse the need for provision to be in sustainable locations.

The Economic Strategy for Bath and North East Somerset 2010 – 2026 states that the Green Belt around Keynsham has led to out commuting. In order to maintain Keynsham as a viable, sustainable market town there is an urgent need to build on its strategic location and transport links to expand and diversify the employment base. This would help to reduce out commuting and replace some of the jobs lost at Cadbury. The Economic Strategy states on page 41 that:

“The future use of the Somerdale site will be critical to the future of Keynsham and the action plan places emphasis on developing employment on this site. A targeted inward investment plan should be put together for Keynsham in order to raise its profile and as a future potential alternative office location to Bristol, as the area has good transport links and the strategic employment site of Somerdale.”

The Action Plan in the Economic Strategy sets out priorities for 2010 – 2013 and listed for Keynsham is: “Bring forward new employment space in Keynsham town centre and at Cadbury Somerdale”, the action was to bring forward a Regeneration Delivery Plan covering Keynsham Town Centre and Cadbury Somerdale, the output is listed as development of the centre which could deliver 10,000sqm of office space, 1,000sqm retail space, 2,000 sqm leisure and community space and up to 600 new and relocated jobs.

Given Keynsham’s acknowledged suitability as a sustainable location for housing development in order to support economic growth in the Bath TTWA, it is not clear what the justification is for developing housing on part of the Somerdale employment site. This location is a suitable employment location in the Economic Strategy, and Keynsham has been identified as an alternative location to Bristol for office development. The Somerdale site falls within Flood Zone 2 and yet is expected to accommodate 600 dwellings. The SFRA has also identified that part of the area is subject to Bath and North East Somerset’s Core Strategy – Publication Stage Representation Form increased risk from climate change. The loss of employment land at Somerdale will not support the self containment of Keynsham and will lead to a further imbalance between housing and employment provision. On this basis an objection is made to the use of the Cadbury Somerdale site for residential development.

Given the above, land to the south of Lays Farm, to the west of Charlton Road, south west Keynsham is considered to be suitable, available and deliverable. Development at Lays Farm would not compromise the principles of the Green Belt nor lead to the coalescence of Keynsham and Stockwood or Keynsham and Saltford. Whilst development of the site would extend development westward, it would not materially change the general disposition of built form and settlement boundaries between Stockwood and Keynsham. Representations were made on behalf of Redrow Homes to the Spatial Options Consultation in 2009 promoting the suitability of the site at Lays Farm to meet development needs.

Keynsham as a market town should be the focal point for locally significant development including the provision of the bulk of district housing provision outside the Bath SSCT and also taking into account Bristol SSCT, thereby increasing its self containment.

**Change sought to make sound:** The Core Strategy should be amended to reflect the latest published household projections in accordance with PPS 3 paragraph 33 so that provision is made for in the order of 18,500 dwellings and the general extent of the Green Belt is redefined at Keynsham so that land west of Keynsham is removed from the Green Belt and development needs can be accommodated sustainably in accordance with national guidance.

Changes would need to be made to Policy DW01 to increase the housing provision for the plan period to at least 18,500 dwellings. Changes would need to be made to the spatial vision for Keynsham and also to Policy KE1 to reflect the strategic location and the need to make provision for 3,000 dwellings instead of 1,500 dwellings at Keynsham. Policy KE1 would also need to define the general extent of the Green Belt by removing land to the south west of Keynsham from the Green Belt.

See proposed changes to Policy KE1

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not in general conformity with the development plan as set out in PPS 12 paragraph 4.50 ie it should conform generally to the Regional Spatial Strategy. The Core Strategy is not legally compliant as it fails in Policy DW01 to make adequate provision for housing needs during the plan period. It does not conform to the development plan as the Interim Regional Strategy set out the need to critically review the Green Belt. The latest DCLG 2008 based household projections indicate the need for higher levels of housing provision than in the Core Strategy. The Council’s own Strategic Housing Market Assessment indicates that there is a very high housing need, both in household growth and in relation to likely future supply.

**Change sought to make legally compliant:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and also consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections. The Core Strategy does not conform to the Regional Spatial Strategy and no local justification is provided for the lack of conformity. The housing figures for the plan period should be increased to at least 18,500 dwellings.

## Plan Reference: Paragraph 3.13

**Reference:** 180\14

**Respondent:** J S Bloor Ltd

**Representation** The Core Strategy is unsound as it does not meet housing needs. The Proposed Changes to the RSS  
**(soundness):** identified the need to alter the general extent of the Green Belt at Keynsham in order to accommodate an urban extension to meet housing needs. An objection is made to the spatial strategy for Keynsham which is set out in Policy KE1 (representations have been made to Policy KE1. Bath and North East Somerset's Core Strategy – Publication Stage Representation Form  
It is considered possible to remove land from the Green Belt at south west Keynsham without affecting the individual character and identity of Saltford, and enable housing needs to be met in a sustainable location.

**Change sought to make sound:** Changes are required to make the Core Strategy sound – these have been proposed in response to Policy KE1.

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not consistent with the development plan. PPS12 paragraph 4.50 states that under the Planning and Compulsory Purchase Act 2004 S 20 (5) (a) an Inspector is charged with firstly checking whether the Core Strategy has complied with legislation. It is considered that for two reasons the Core Strategy is not legally compliant as it is not in general conformity with the development plan (i.e. the RS has now be re-instated as part of the development plan and will remain so until the Localism Bill is enacted – this is envisaged to be late in 2011) and secondly as it fails to take account of national policy in terms of PPS 3 paragraph 33, the Governments latest published household projections ( 2008 based published in Nov 2010) and evidence of current and future housing need as stated in the West of England Housing Market Assessment June 2009.

**Change sought to make legally compliant:**

**Reference:** 239\8

**Respondent:** Keynsham Civic Society

**Representation** Strongly endorse the strategy maintaining the Green Belt boundary surrounding Keynsham but would  
**(soundness):** go further and seek the reinstatement of the Green belt land removed in 2006.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

## Plan Reference: Paragraph 3.14

**Reference:** 180\15

**Respondent:** J S Bloor Ltd

**Representation** The Core Strategy is unsound as it does not meet housing needs. The Proposed Changes to the RSS  
**(soundness):** identified the need to alter the general extent of the Green Belt at Keynsham in order to accommodate an urban extension to meet housing needs. An objection is made to the spatial strategy for Keynsham which is set out in Policy KE1 (representations have been made to Policy KE1).

**Change sought to make sound:** The changes that are required to make the Core Strategy sound are set out in the representations to Policy KE1.

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not consistent with the development plan. PPS12 paragraph 4.50 states that under the Planning and Compulsory Purchase Act 2004 S 20 (5) (a) an Inspector is charged with firstly checking whether the Core Strategy has complied with legislation. It is considered that for two reasons the Core Strategy is not legally compliant as it is not in general conformity with the development plan (i.e. the RS has now be re-instated as part of the development plan and will remain so until the Localism Bill is enacted – this is envisaged to be late in 2011) and secondly as it fails to take account of national policy in terms of PPS 3 paragraph 33, the Governments latest published household projections ( 2008 based published in Nov 2010) and

evidence of current and future housing need as stated in the West of England Housing Market Assessment June 2009.

**Change sought to make legally compliant:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and consistent with the evidence base of the latest RSS. Provision should be made to meet the latest household projections and take into account evidence of housing need. The housing figures for the plan period should be increased to at least 18,500 dwellings

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**Reference:** 239\9

**Respondent:** Keynsham Civic Society

**Representation** Recommend that the land earmarked for 'K2' Development should be reinstated as Green belt. The  
**(soundness):** references to K2 infer that this development has been fully agreed and will proceed despite the issues over access.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 256\9

**Respondent:** Councillor Andrew Furse

**Representation** •3d; Inclusion of Keynsham K2 development (already agreed).  
**(soundness):**

Councillor Andrew Furse  
Liberal Democrat,

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Policy KE1: Keynsham Spatial Strategy**

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**Reference:** 96\1

**Respondent:** Keynsham Town Council

**Representation** • The Town Council are disappointed that the refreshment Town Plan was not able to go in - concerned  
**(soundness):** that residents may feel that it was a waste of time completing it therefore felt there should have been an explanation in the Core Strategy explaining this situation as to why it was unable to go in.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 96\2 S

**Respondent:** Keynsham Town Council

**Representation** The Town Council is pleased to see that the Green Belt is being protected.  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**



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**Reference:** 96\3 S

**Respondent:** Keynsham Town Council

**Representation (soundness):** The Town Council felt that the housing figures are realistic.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 131\2

**Respondent:** Mr G. Fear

**Representation (soundness):** It is presently stated that K2A and K2B are still retained in the Draft Core Strategy report. However, this land was only removed from the Green Belt because a Government Inspector came to a conclusion that the evidence put forward by the BANES highways department that an access road could be provided from Park Road to K2B was achievable. Abbots wood remains in the Greenbelt. The K2B site was visited and recently considered by BANES very own Councillors on the Planning Development Committee. They came to a decision that agreed with the many residents and communities that objected. The application was refused on unsuitable access and other planning conditions that were not met by the developer. Common sense prevailed. The removal of this land from the Greenbelt has been authorised under false pretences, as no suitable access to this site is practical or safely possible.

It has been recently mentioned that a road may be possible through the Abbots Wood to provide a link road to Charlton Rd. Charlton Rd and St Ladoc Rd. has long standing weight restriction limits applied to them. With both K2A and K2B, the possibility of up to 700 homes which has been mentioned (1400 cars + industrial + deliveries + possible public transport etc). Charlton Rd./St Ladoc Rd. would not cope with this traffic which will pass two schools. Placing a road through the middle of woodland would totally destroy the woodlands value to both wild life and the local community and as such would be very controversial. The purpose of the wood, which the local community planted, would be brought into disrepute and open to abuse by having a road built through it. It was planted as a quiet recreational and nature reserve area. It would be a terrible shame if this was damaged, as so many people have given their free time to achieve it. Wild life would not be able to cross such a busy road safely and would not have free access to the countryside. Woodlands should be noise free without the illumination from street lights. People would not walk along such a road or pathway in the dark winter afternoons for safety reasons. The Land should be reinstated to the Greenbelt. As additional employment facilities are planned over a mile away from K2 at Somerdale which is, adjacent the Railway Station it only seems logical that any housing for local people should be included here. It is easily accessible by buses, unlike K2B and access on to the Bypass and ring road can be provided.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 154\2 S

**Respondent:** British Waterways

**Representation (soundness):** We are pleased to note that the Policy advocates making better use of the existing green and blue infrastructure running through and surrounding the town.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 180\20

**Respondent:** J S Bloor Ltd

**Representation** The Core Strategy is unsound as it does not meet housing needs. The Proposed Changes to the RSS (**soundness**): identified the need to alter the general extent of the Green Belt at Keynsham in order to accommodate an urban extension to meet housing needs. Objection is made the following points of the Policy:

#### 1 Natural and Built Environment

The policy maintains the Green Belt surrounding Keynsham. The need to review the Bristol/Bath Green Belt has been a long stranding issue and was raised in RPG10 published in 1994, paragraph 4.11 stated that the need to provide for additional development consistent with the principle of reducing the need to travel set out in PPG13, may require some physical reappraisal of the current configuration of green belts. This was then taken forward in RPG 10 published in 2001 which became the Interim RSS in 2004 pending the review of RPG10. Policy SS 4: Green Belt set out the policy framework for the region – while Green Belts should continue should continue to fulfil the purposes as set out in PPG2, Local Planning Authorities should:

- “...critically review the Green Belt to examine whether boundary alterations are needed to allow for long term sustainable development needs;
- “remove land from the Green Belt for development, if on balance, this would provide the most sustainable solution for accommodating future development requirements.”

Policy SS4 of the RPG 10 (i.e. the Interim RSS) concluded that there was a need for the Green Belts in the region to be critically reviewed in the next round of Structure Plans. This Review was intended to examine whether the Green Belts needed to be amended to meet the long term sustainable development needs, given climate change objectives. The Avon Joint Replacement Structure Plan (JRSP) 2002 states that the full implications of new RPG10 (the 2001) version would be addressed in the next review of the Structure Plan. However, with the introduction of Regional Spatial Strategies in 2004 – the strategic review of the Green Belt became the responsibility of the South West Regional Assembly and was undertaken by the West of England Partnership Joint Study Area Section 4 (4) authorities during the preparation of the RSS. The urban extension to Keynsham was identified following the debate at the Regional EIP and was a recommendation of the Panel in their report Dec 2007. This was endorsed by the Secretary of State in the Proposed Changes to the RSS in 2008. In view of the housing need as evidenced in the latest DCLG 2008 based household projections, the need to remove land from the Green Belt remains justified, consequently Policy KE1 should reflect this and make provision to change the boundaries of the Green Belt.

#### 2 Housing

The Core Strategy makes provision for 1,500 new homes at Keynsham in the plan period 2006 – 2026 this is half the number of new homes that the RSS envisaged for Keynsham in Policy HMA1: West of England HMA.

The RSS considered that in order to make the necessary provision for new homes and to fulfil the role of the SSCTs in terms of their economic potential, which could not be met in the existing urban areas, then the most sustainable solution is to provide for urban extensions to the SSCTs. This was debated at the Regional EIP and was a recommendation of the Panel. To address these exceptional circumstances, the RSS makes changes to the general extent of the Green Belt, removing the designation from the areas required to accommodate the proposed urban extensions. The Panel considered that Keynsham was a suitable sustainable location for housing development in order to support economic growth in the Bath TTWA. Keynsham was considered as a suitable location as it would allow development to serve the wider needs of the conurbation. The Panel considered that Keynsham can provide a wide range of community services for new development and that it would be an attractive location for associated employment development. The combination of these factors makes Keynsham a sustainable location. The Panel considered that there was sufficient scope for development around Keynsham to allow development to proceed without threatening the integrity of the separation that the Green Belt ensured. This was endorsed the Secretary of State in the Proposed Changes to the RSS. The Secretary of State agreed that Keynsham has a strong function relationship with Bristol and forms part of the Bristol SSCT. It was considered that there were opportunities at Keynsham both for housing and employment to strengthen its role, so it could better serve its own population and that of the surrounding area. The

vision for Keynsham should as part of the vision for BANES and be in general conformity with the RSS (albeit that it is the Interim RSS i.e. the former RPG 10 of September 2001 that is the RSS in the absence of the latest RSS being finally adopted). Whilst in principle the need to critically review the Green Belt was established through RPG10, in order to allow for long term sustainable development, the evidence base of the latest version of the RSS takes this further and the latest evidence base is a material consideration. Clearly the vision is not in general conformity with the RSS, as the Core Strategy has not reviewed the Green Belt in the context of making provision for long term sustainable development needs.

### 3. Economic Development

The Core Strategy proposes that some of the former Cadbury Somerdale site should be used for housing rather than and greenfield sites in Keynsham. It is not clear what the justification is for reducing the amount of employment on this site, when the BANES Economic Strategy states that the future use of the Somerdale site will be critical to the future of Keynsham, and the action plan places an emphasis on developing employment space on this site. The BANES Economic Strategy page 41 also states that: "A targeted inward investment plan should be put together for Keynsham in order to raise its profile as a future alternative office location to Bristol as the area has good transport links and the strategic employment site of Somerdale." The Core Strategy seeks to focus new employment development in the central area of Keynsham including the town centre and the 25 hectare Somerdale Factory site and the transition area between the northern end of the High Street and the Somerdale Factory. The strategy is seeking to provide more High Value Added Jobs in order to reduce the current pattern of out-commuting. It is noted that the town centre is a regeneration priority areas which is key to the successes of the local economy and the district as a whole.

Some land (approximately 10 hectares) within the Somerdale site falls within Flood Zone 2 (partly) and this is expected to accommodate 600 dwellings. The justification for this is that there are no alternative sites to offer the same level and type of opportunity to serve the town as a whole. It is noted that the allocation of this site has not taken place as yet and that further work on the sequential test will need to be undertaken. Master planning for Somerdale has not been undertaken – but it is stated that the most vulnerable uses should be directed to flood Zone 1; but as no master planning has been done for the site it is not clear how this relates to the design proposals for the site. The SFRA also identified that part of the area is subject to increased risk from climate change.

Given the above uncertainties about the deliverability of the Somerdale site and its role and location in terms of accommodating jobs; and given the need to accommodate BANES housing needs sustainably; land to the south west of Keynsham should be considered as a strategic location. The exceptional circumstance for removing this land from the Green Belt has already been proven through the preparation of the RSS, the site is not within the Flood Zones and can be delivered to serve the town and complement the employment opportunities at Keynsham that will be delivered through the regeneration of the town centre.

**Change sought to** Policy KE1 should be amended as follows:

**make sound:** 1. Natural and Built Environment

a. Land to the south west of Keynsham will be removed from the Green Belt. In all other area around Keynsham the Green Belt will be retained.

2. Housing

a. Make provision for around 3,000 new homes (net) between 2006 and 2026.....

b. Allow for residential development if it is within the housing development boundary defined on the proposals map or if it forms an element of Policy KE2. The housing development boundary will be revised to include land within south west Keynsham.

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not consistent with the development plan. PPS12 paragraph 4.50 states that under the Planning and Compulsory Purchase Act 2004 S 20 (5) (a) an Inspector is charged with firstly checking whether the Core Strategy has complied with legislation. It is considered that for two reasons the Core Strategy is not legally compliant as it is not in general conformity with the development plan (i.e. the RS has now be re-instated as part of the development

plan and will remain so until the Localism Bill is enacted – this is envisaged to be late in 2011) and secondly as it fails to take account of national policy in terms of PPS 3 paragraph 33, the Governments latest published household projections ( 2008 based published in Nov 2010) and evidence of current and future housing need as stated in the West of England Housing Market Assessment June 2009.

**Change sought to make legally compliant:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and also the evidence base for latest RSS. Provision should be made to meet the latest household projections. The housing figures for the Core Strategy plan period should be increased to at least 18,500 dwellings.

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**Reference:** 187\1

**Respondent:** Cave associates: Edward Drewe

**Representation** No reason given  
**(soundness):**

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 233\1

**Respondent:** Avon Valley Farm

**Representation** Whilst we support the overall intentions of B&NES Core Strategy Development Plan Document (DPD),  
**(soundness):** we feel that there has been insufficient thought and support given to the role that the Avon Valley can play in the strategic development and revitalisation of Broadmead, Keynsham and Somerdale. This could be greatly enhanced by the integration of water compatible Flood Risk Management Infrastructure at Avon Valley that is compliant with Planning Policy Statement 25 (Development and Flood Risk) and linked to jobs, tourism and business growth.

As a major landowner upstream of Somerdale, Keynsham and Broadmead (and Bristol), we feel that the Strategic Vision for Keynsham in the Core Strategy does not wholly consider the social, environmental, economic and resource use potential of Avon Valley and the River Avon. Similarly, the strategic role that our land in Avon Valley could play in the compensation of lost flood plain, raised defences at Broadmead and Somerdale, and the significant demand from Bristol City for upstream 'volume for volume' flood compensation infrastructure to offset climate change flood predictions (see Bristol Avon Catchment Flood Management Plan 2009, B&NES Strategic Flood Risk Assessment 2008 and B&NES Flood Risk Management Strategy 2010). Flood Risk Management has not been sufficiently Justified in the Core Strategy nor by IDP Reference K1.2 of Table 6 on page 73, which only identifies Somerdale for flood protection measures even though the B&NES Infrastructure Delivery Programme (2010) clearly states "...works on site or upstream". The requirement for upstream flood risk management infrastructure is further supported by the suite of Level 2 SFRA maps and the options ranking table of the Outline Appraisal for Keynsham (Flood Risk Management Strategy 2009) that included 'Rural land use change upstream of Keynsham' and 'Storage / wetland creation upstream of Keynsham on the River Avon and River Chew'.

The Vision for Keynsham in the Core Strategy does not Justify the potential for increasing upstream flood plain storage capacity outlined above, which is clearly omitted from the map in Diagram 12 on page 65. Similarly, the Vision for Keynsham does not Justify the potential role our land could play in linking the proposed development in the High Street, Somerdale and Keynsham railway station to the Avon Valley and other successful businesses via the River Avon which should act as blue infrastructure for locals, visitors and tourists alike. Again this is clearly omitted from the map in Diagram 13 on page 67, which could further help Keynsham capitalise on this resource by including the river upstream of Keynsham for increased recreational activity, tourist attraction and consequential footfall to Keynsham High Street. A ferry boat could also provide a vital transport link between Keynsham railway station, Broadmead Industrial Estate (100 people work each day) and Saltford. By including the River Avon and Avon Valley into these two diagrams rather than ignoring their potential, B&NES would provide for a

more Effective and Sound infrastructure delivery plan.

The Avon Valley Farm of 170 acres is on land that has been occupied for hundreds of years and is believed to have been the first occupied farm in the area (pers comm). The Avon Valley Adventure and Wildlife Park occupies 50 acres, including flood plain at the northern periphery and is classed for recreational use. The Park has been successfully trading for over 20 years and is all funded by private investment. It attracts around 95,000 visitors per annum including 170 school visits in June and July and is the only visitor attraction of its type in B&NES. The facility provides fun and interactive teaching and learning opportunities for children and adults alike, allowing access to animals and habitats that are conversant with sustainability and provide understanding of the world we live in. We provide jobs, recreation, leisure, education in an inclusive environment.

With increasing flood risk, our mitigation strategy is to free-up the flood plain and adjacent land for uses that are resilient to climate change, particularly river flooding. We have the capacity to incorporate flood compensation measures that would quickly capture and slowly release 'volume for volume' flood water to the benefit of our own site and downstream developments in Broadmead, Keynsham, Somerdale and Bristol. The proposed Avon Valley Marine Park would play a vital role in creating temporary and full time jobs, increase tourist footfall, provide evening and weekend economy uses, increase the volume and value of biodiversity and habitats in a purpose built, flood resilient marina and ecological water park. It will also act as a balancing tank for flood waters and add value to the continuing diversification of our generational farm. Our land is strategically positioned for this type of development and it is sufficiently distant downwind from the Broadmead sewage treatment works, industrial buildings and proposed materials recycling facility so as not to cause potential nuisance. Our outline scope is available to B&NES on request.

By embracing the Avon Valley into the Core Strategy, we can play our role in enhancing Keynsham, improving the economy, future proofing our key assets, capitalising on our river location and help Keynsham to remain proud and independent. It will also provide opportunity to attract investment and jobs to the peninsula around a unique recreational and educational facility in B&NES.

**Change sought to make sound:** The following recommendations are for your further consideration, adoption or rejection in order to Justify an Effective and Sound Core Strategy:

1. Diagram 12 on page 65 should identify the connectivity of Avon Valley and Broadmead to Keynsham via the Green Infrastructure Link as defined on Diagram 20 of page 119. We are awaiting the publication of B&NES Placemaking Plan and B&NES Green Infrastructure Strategy with much interest.
2. Diagram 13 on page 67 should make reference to the close proximity of the canal and River Avon to Keynsham railway station and its potential for upstream and downstream trade, transport and tourism
3. Section 3.15 on page 63 should read "The role of the town centre and Somerdale as the main focus for business activity will be complemented by the Broadmead/Ashmead/Pixash Industrial Estate area and Avon Valley Parks."
4. Section 3d on page 64 should read "Retain the Broadmead/Ashmead/Pixash Industrial Estate and Avon Valley Parks as an area for business activity (use classes B1, B2, B8 and D2e) complementing the role...."
5. Section 3.18c on page 68 should read "Facilities within and adjacent to the town that provide opportunities for leisure and recreation, such as the Memorial Park, a leisure centre, the Fry Club and Avon Valley Adventure and Wildlife Park."
6. Section 3.18e on page 68 should read "The proximity of the railway station to the High Street, Somerdale and River Avon."
7. Section 1 Key Opportunities on page 71 should include a third item, "c Broadmead and Avon Valley"
8. Section 3 Placemaking Principles on page 71 should read "g Retain and enhance the leisure and recreation function of the town centre, Somerdale and Avon Valley
9. Section 3 Placemaking Principles on page 71 should read "h Enhance the rivers, parks and green spaces and link them together to form an improved green and blue infrastructure network (linking the town internally and to its environs)."
10. Section K1.2 of Table 6 on page 73 should read "On site or upstream works necessary to obtain planning permission."

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 238\2

**Respondent:** Nash Partnership

**Representation** As stated in PPS12, one of the key tests of soundness is the effectiveness of a Core Strategy. Paragraph (soundness): 4.44 of PPS12 states that to be effective, Core Strategies must be 'deliverable, flexible and able to be monitored'. The emerging Core Strategy fails in this respect, as it is too rigid in its structure, and relies entirely on a review of the plan as a means of handling uncertainty.

An example of this is the inflexible approach taken for Keynsham. The Core Strategy cites the importance of economic growth, with support for it being provided by 1,500 new homes and 1,500 new jobs. However, the proviso is made that no changes will be made to the Greenbelt, and the majority of development will take place on Brownfield sites. Whilst we support the intention of redeveloping Brownfield sites, the Core Strategy also needs to incorporate a high level of flexibility so it can respond to economic fluctuations and unforeseen issues. Recent economic activity and pressures on finance streams have made some Brownfield sites completely unviable, and their delivery has had a significant impact on housing supply trajectories. In some cases, allocated sites with outline planning permission have struggled to come forward, or have a significant level of work required to bring them forward. Some existing allocated sites (such as those to the south of Keynsham) are not as sustainable as others – their 'bolted on' location on the periphery of the town reflects the poor approach to development before the sustainability agenda was more fully understood.

Bath and North East Somerset's Core Strategy – Publication Stage Representation Form with them. Again, we reiterate that such an approach is not flexible, and therefore fails the 'Effective' element in The Tests of Soundness.

It is our view that the emerging Core Strategy is ineffective because of its inflexibility, particularly in relation to Keynsham. On this basis the emerging Core Strategy is unsound.

**Change sought to make sound:** Whilst the intention to utilise Brownfield sites is admirable and appropriate, the Core Strategy needs to include text that allows for alternative sites to be included if required. These should be examined annually within the Strategic Housing Land Availability Assessment, and the Core Strategy should be flexible enough to allow such sites to come forward if previously identified sites are undeliverable. Whilst we have no objection to sites and broader areas being identified in the Core Strategy, there must be methodology that allows for alternative sites to come forward if necessary. More flexibility must be built into the plan, thereby meeting the 'effective' element in The Tests of Soundness.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 239\10

**Respondent:** Keynsham Civic Society

**Representation** 1 No mention is made of how the ecological and environmental impact of increased river access will be (soundness): managed.

2b See comments above, under 3.13 & 3.14 with respect to 'K2'.

4a The provision of larger retail units in the town centre should not be at the detriment of the existing smaller businesses (see also EH statement in 3.19a, about loss of smaller shop frontages).

6a Endorse this strategy.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 245\4 S

**Respondent:** Environment Agency

**Representation** Policies KE1 and KE2

**(soundness):** Similar to Bath BANES's Sequential and Exception Test report has sought to justify locating development in a flood risk area (Somerdale site) based on other sustainable considerations that need to be taken into account. Given this the inspector should ensure that they are satisfied that BANES have applied appropriate weight to these other sustainability considerations compared to flood risk, and therefore that this justifies locating new development in flood risk areas. We are pleased to see that it has been highlighted in the Sequential and Exception Test report that a sequential approach should be taken to the masterplanning of the Somerdale site. It is important that this is highlighted given the significant opportunity that exists to direct development away from flood risk at Somerdale.

It is good to see that making better use of green infrastructure and enhancing the river corridor have been highlighted in the policies for Keynsham. There is a real opportunity for green infrastructure in Keynsham to have a multi-functional role in terms of flood risk management, recreation and habitat creation. It will be crucial that the placemaking plan and regeneration delivery plan for Keynsham are adequately informed by the emerging Green Infrastructure Strategy.

Infrastructure and Delivery

We are pleased to see that flood risk management, sewage and habitat creation have been highlighted as required infrastructure in the Core Strategy for Keynsham. We agree with phasing and funding sources as detailed in the infrastructure delivery plan.

**Change sought to make sound:** N/A

**Representation (legal compliance):**

**Change sought to make legally compliant:** N/A

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**Reference:** 248\9

**Respondent:** Crest Strategic Projects and Key Properties Ltd

**Representation** 1)It is remarkable to consider the extent to which BANES has turned its back on Bristol in this CS.

**(soundness):** Despite acknowledging the obvious in the Spatial Options Paper, seemingly Keynsham now has no relationship to Bristol. There is acknowledgment of 'strong out-commuting' but fails to reference to where. Perhaps it is obvious, but the fact is that Keynsham residents will always be inextricably linked to the Bristol economy (ever more so following the closure of Somerdale). In considering the role of an urban extension at Hicks Gate, Annex 5 of the SA concludes, "Although the Spatial Strategy proposes employment development in Keynsham, it does not provide any additional employment opportunities to the South East of Bristol which might have benefited residents of Keynsham and further reduced distances travelled for work. Not creating an urban extension in the Hicks Gate area would not improve this approach into Bristol or contribute to creating a sense of place or community for this area."

2)It is clear that there is a perceived link to Bristol in the SA, and that there are benefits to growth at Bristol for Keynsham residents. This is also recognised in the sustainability appraisal of 2006 which makes reference to, "Hicks Gate area maybe of better for employment provision. It could also provide local job opportunities for Keynsham acknowledging the existing high levels of commuting that currently exist from Keynsham to Bristol".

3)Paragraph 3.06 suggests that the urban fringe of Bristol is little more than a mile away. In itself, this is a wholly inaccurate statement but clearly underlines the prevailing stance for Green Belt protection. This is followed up in paragraph 3.13; such is the fierce protection of the Green Belt that the CS proposes that 'access to it will be enhanced'. Does this Council really understand what Green Belt means? Green Belt is a planning tool; it is nothing else. There is nothing intrinsically special or valuable about Green Belt land. There is no overriding quality to the landscape that makes it more attractive than any other part of the landscape not affected by Green Belt designation. The statement in paragraph 3.13 merely shows how local politics has got in the way of proper strategic planning. There is nothing special about the Green Belt around Keynsham; indeed it was the only element of Green Belt land to be subject to change through the last round of Structure Planning.

4) Regardless, RPS does accept that the Green Belt in the area between Bristol and Keynsham is sensitive, but strongly advocates that development at Hicks Gate will not impact adversely on the purpose of the Green Belt in this location. In the first instance the context for Green Belt removal in this location is already thoroughly established, and through its submissions on the draft RSS and EiP, BANES recognised that the principle of Green Belt deletion in this location needs to be considered against the overriding sustainability benefits of development. The Panel concluded at paragraph 4.0.36 that, "We have considered the proposed Green Belt exclusions, including our additional proposals, against these intentions. We conclude that the proposals do not threaten the main purposes of the Green Belts within the region."

5) Defensible boundaries to identifying a new Green Belt edge at Hicks Gate exist in the form of manmade features (ie Hicks Gate roundabout and the A4174 ring road) and natural features such as the steep topography to the south of the A4 that will provide a clear development edge that will set the context for the Green Belt in this location in the long term, and most likely in perpetuity. On a related matter, the EiP Panel recommended an area of search around the edge of Keynsham for up to 3,000 new homes. It was clear that having thoroughly appraised the area, the Panel did not consider the Green Belt around Keynsham to be sacrosanct. Development at Hicks Gate offers many benefits to the population of Keynsham, not least through the potential job offer, and not least through setting new Green Belt boundaries that will endure in the long term.

**Change sought to make sound:** 1) The CS has to recognise that the Green Belt has to be reviewed in order to cater for sustainable development and provide realistic job opportunities for those residents of Keynsham. The links between Keynsham and Bristol have to be explicitly recognised and catered for. It is naive to consider that Keynsham will ever be entirely 'self-sufficient'.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 252\3 S

**Respondent:** Cadbury Kraft Foods

**Representation (soundness):** We fully support and endorse the identification of Somerdale as part of a strategic development site within Policy KE1 and KE2. This emerging policy reflects the significant potential of Somerdale as a major development site within the District, which will provide new employment and houses as part of a new, distinctive high quality neighbourhood and will contribute to the future of Keynsham. However, we also make the following points:

1. The strategic site can potentially accommodate further development. The Somerdale Vision identifies that the site can accommodate approximately 600 dwellings and 20,000 sq m of commercial space. The capacity put forward for the strategic site of 700 units should therefore take account of the level of development which can be accommodated on Somerdale and any other sites which will be coming forward in the area over the Plan period.
2. We acknowledge the desire to provide a District Heating Network within Keynsham, with potential at Somerdale and the town centre. However, actual proposals for sustainable energy measures on the site will need to be fully explored as part of the future development proposals for the site.
3. With regard to consideration being given to the potential for converting and reusing some or all of the factory buildings at Somerdale, this approach is consistent with the development principles within the Vision. The Vision identifies that consideration will be given to the retention of buildings and assets where viable and capable of making a positive contribution.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 255\1

**Respondent:** Taylor Wimpey Developments

**Representation (soundness):** Why We Consider The Core Strategy Unsound



In the context of our objection, the Council should be seeking locations for 7,300 additional homes with BANES. This is the difference between our proposed housing provision, excluding the urban extension at Whitchurch, and the Council's proposed housing provision (18,300-11,000). Much of this would be expected to be directed towards Bath, but as the next largest urban areas Keynsham and Norton Radstock should also take a share. Keynsham is regarded as a sustainable settlement with good bus and rail links to Bristol and Bath. It should therefore be considered for a higher level of development because of this. Provision should be made for at least 2,500 homes and in the interests of sustainability it should be accepted that releases of land from the green belt should be acceptable. The exceptional circumstances are the need for additional homes in a sustainable location.

Our clients control land at Bristol Road and Minsmere Road. Both sites are in the green belt but we submit would do minimal harm to the openness of the green belt and coalescence between settlements. Each site is about 3.2 hectares in area and can therefore accommodate about 100-125 dwellings depending on density (200-250 in total). Neither is therefore strategic. However we would be seeking an indication of a direction of growth west of the town centre and east of the urban area to accommodate them and an acknowledgement of the need to change green belt boundaries.

The site at Bristol Road is unused open land. The site rises up steadily from the flat floodplain of the River Avon becoming quite steep at its eastern end. The site is bounded by the Keynsham Bypass to the north east, a mixture of uses adjacent to the town centre to the south east and playing pitches to the west and north. It is separated from the pitches by a hedgerow. It is located close to the town centre and abuts the boundary of the proposed Strategic Site, indeed it is much closer to the town centre than the Somerdale Site. For this reason we consider it would be suited to a mixed residential, commercial and retail use. It will be noted that much of this site is identified on the Environment Agency's flood maps as being within the area that could be subject to an extreme flooding event, though not the high risk category. This would place the site in Flood Zone 2 where housing, shops and offices are all appropriate uses according to PPS25: Development and Flood Risk. We note that the same categorisation applies to parts of the Somerdale Site that is currently proposed for inclusion in the Strategic Site. In the Bath and North East Somerset Local Plan only a small part of the site is identified as being a risk of flooding, i.e. the part which is in the high risk category. In short, flood risk does not present an impediment to the proposed uses.

The site is currently in the Green Belt and the production of the Core Strategy provides an opportunity to review Green Belt boundaries. In the context of the Bristol and Bath Green Belt, which covers a wide area, we would not regard the removal of this site from the Green Belt as being a change to its general extent. We do not consider that the site plays any significant role in fulfilling Green Belt objectives, while the need for additional housing comprises the exceptional circumstances for changing the Green Belt Boundary. This site appears to be well located in relation to the town centre and should therefore form an addition to the Strategic Site which can help to meet local housing needs and make an addition to the town's commercial centre. We therefore seek this change to the Core Strategy which would extend the Strategic Site a short distance to the west to include this site.

The site at Minsmere Road is currently in agricultural use and adjoins an existing housing estate from which there are a number of possible points of access. The land is fairly flat and enclosed by good hedges and a belt of woodland which forms part of the Manor Road Community Woodland. Bath and North East Somerset's Core Strategy – Publication Stage Representation Form In the Bath & North East Somerset Local Plan the site is identified as being in Green Belt and is covered by the Forest of Avon Policy. The Community Woodland is classified as part of a local nature reserve. The site currently provides a somewhat incongruous strip of farmland between existing housing and the community woodland. Its value as farmland is compromised by this location and the public footpath that runs across it which is designated as an access point to the Community Woodland. Development of the site for housing would help to meet the housing requirements of the area, which we have demonstrated that the Core Strategy currently fails to do. The existence of the Community Woodland means that there will be a firm barrier to further development to the east. We submit that this land serves no useful purpose as farmland. Because of the extensive hedgerows on its boundaries its development will have no meaningful effect on green belt functions. In particular the presence of the Community

Woodland ensures that development will not lead to “unrestricted sprawl”, to use the words of PPG2, and will not lead to neighbouring towns merging into each other. Encroachment on the countryside will be minimal and easy access to the Community Woodland ensures can be maintained.

As previously stated, the production of the Core Strategy provides an opportunity to review Green Belt boundaries. As with the site at Bristol Road, we would not regard removal of this site from the Green Belt as being a change to its general extent. The need for additional houses creates the exceptional circumstances for amending the Green Belt boundary. We therefore consider that the site would perform a more valuable function to the community by providing homes, possibly in conjunction with the land to the south, than remaining as marginal agricultural land.

- Change sought to** 1. Increase the level of housing provision at Keynsham to 2,500 houses;  
**make sound:** 2. Delete sub-paragraph a) and replace with text stating that minor changes to the green belt boundary will be made in order to meet local housing needs.  
3. Show directions for housing growth to the west of the town centre and the east of the urban area.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 275\1

**Respondent:** Redrow Homes (South West) Ltd.

**Representation (soundness):** The Core Strategy is unsound as it does not meet housing needs. The Secretary of State's proposed changes to the RSS identified the need to alter the general extent of the Green belt at Keynsham in order to accommodate an urban extension to meet housing needs.

Objection is made to the following points of the Policy:

1. Natural and Built Environment

The policy maintains the Green Belt surrounding Keynsham. The need to review the Bristol/Bath Green Belt has been a long standing issue and was raised in RPG10 Published in 1994, paragraph 4.11 stated that the need to provide for additional development consistent with the principle of reducing the need to travel set out in PPG13, may require some physical reappraisal of the current configuration of green belts. This was then taken forward in RPG 10 published in 2001 which became the interim RSS in 2004 pending the review of RPG10.

Policy SS 4: Green Belt set out the policy framework for the region- while Green Belts should continue should continue to fulfil the purposes as set out in PPG2, Local Planning Authorities should: "...Critically review the Green Belt to examine whether boundary alterations are needed to allow for long term sustainable development needs;" "remove land from the Green Belt for development, if on balance, this would provide the most sustainable solution for accommodating future development requirements."

Policy SS4 of the RPG 10 (i.e. the interim RSS) concluded that there was a need for the Green Belts in the region to be critically reviewed in the next round of Structure Plans. This Review was intended to examine whether the Green Belts needed to be amended to meet the long term sustainable development needs, given climate change objectives.

The Avon Joint Replacement Structure Plan (JRSP) 2002 states that the full implications of the new RPG10 (the 2001) version would be addressed in the next review of the Structure Plan. However, with the introduction of Regional Spatial Strategies in 2004 – the strategic review of the Green Belt became the responsibility of the South West Regional Assembly and was undertaken by the West of England Partnership Joint Study Area Section 4 (4) authorities during the preparation of the RSS.

The urban extension to Keynsham was identified following the debate at the Regional EIP and was a recommendation of the Panel in their report Dec 2007. This was endorsed by the Secretary of State in the Proposed Changes to the RSS in 2008. In view of the housing need as evidenced in the latest DCLG 2008 based household projections, the need to remove land from the Green Belt remains justified,

consequently Policy KE1 should reflect this and make provision to change the boundaries of the Green Belt.

## 2 Housing

The Core Strategy makes provision for 1,500 new homes at Keynsham in the plan period 2006 – 2026 this is half the number of new homes that the RSS envisaged for Keynsham in Policy HMA1: West of England HMA. The RSS considered that in order to make the necessary provision for new homes and to fulfil the role of the SSCTs in terms of their economic potential, which could not be met in the existing urban areas, then the most sustainable solution is to provide for urban extensions to the SSCTs. This was debated at the Regional EIP and was a recommendation of the Panel. To address these exceptional circumstances, the RSS makes changes to the general extent of the Green Belt, removing the designation from the areas required to accommodate the proposed urban extensions.

The Panel considered that Keynsham was a suitable sustainable location for housing development in order to support economic growth in the Bath TTWA. Keynsham was considered as a suitable location as it would allow development to serve the wider needs of the conurbation. The Panel considered that Keynsham can provide a wide range of community services for new development and that it would be an attractive location for associated employment development. The combination of these factors makes Keynsham a sustainable location. The Panel considered that there was sufficient scope for development around Keynsham to allow development to proceed without threatening the integrity of the separation that the Green Belt ensured.

This was endorsed the Secretary of State in the Proposed Changes to the RSS. The Secretary of State agreed that Keynsham has a strong function relationship with Bristol and forms part of the Bristol SSCT. It was considered that there were opportunities at Keynsham both for housing and employment to strengthen its role, so it could better serve its own population and that of the surrounding area.

The vision for Keynsham should, as part of the vision for BANES and be in general conformity with the Bath and North East Somerset's Core Strategy – Publication Stage Representation Form RSS (albeit that it is the Interim RSS i.e. the former RPG 10 of September 2001 that is the RSS in the absence of the latest RSS being finally adopted). Nevertheless, the evidence base of the latest RSS is a material consideration. Whilst in principle the need to critically review the Green Belt was established through RPG10 in order to allow for long term sustainable development, the evidence base of the latest version of the RSS is a material consideration.

Clearly the vision is not in general conformity with the RSS, as the Core Strategy has not reviewed the Green Belt in the context of making provision for long term sustainable development needs.

## 3. Economic Development

The Core Strategy proposes that some of the former Cadbury Somerdale site should be used for housing rather than greenfield sites in Keynsham. It is not clear what the justification is for reducing the amount of employment on this site, when the BANES Economic Strategy states that the future use of the Somerdale site will be critical to the future of Keynsham, and the action plan places an emphasis on developing employment space on this site.

The BANES Economic Strategy page 41 also states that:

“A targeted inward investment plan should be put together for Keynsham in order to raise its profile as a future alternative office location to Bristol as the area has good transport links and the strategic employment site of Somerdale.”

The Core Strategy seeks to focus new employment development in the central area of Keynsham including the town centre and the 25 hectare Somerdale Factory site and the transition area between the northern end of the High Street and the Somerdale Factory. The strategy is seeking to provide more High Value Added Jobs in order to reduce the current pattern of out-commuting. It is noted that the town centre is a regeneration priority areas which is key to the successes of the local economy and the district as a whole.

Some land (approximately 10 hectares) within the Somerdale site falls within Flood Zone 2 (partly) and this is expected to accommodate 600 dwellings. The justification for this is that there are no alternative sites to offer the same level and type of opportunity to serve the town as a whole. It is noted that the allocation of this site has not taken place as yet and that further work on the sequential test will need to be undertaken. Master planning for Somerdale has not been undertaken – but it is stated that the most vulnerable uses should be directed to flood Zone 1; but as no master planning has been done for the site it is not clear how this relates to the design proposals for the site. The SFRA also identified that part of the area is subject to increased risk from climate change.

Given the above uncertainties about the deliverability of the Somerdale site and its role and location in terms of accommodating jobs; and given the need to accommodate BANES housing needs sustainably; land to the south west of Keynsham should be considered as a strategic location. The exceptional circumstance for removing this land from the Green Belt has already been proven through the preparation of the latest RSS, the site is not within the Flood Zones and can be delivered to serve the town and complement the employment opportunities at Keynsham that will be delivered through the regeneration of the town centre.

**Change sought to** Policy KE1 should be amended as follows:

**make sound:** 1. Natural and Built Environment

a. Land to the south west of Keynsham will be removed from the Green Belt.

2. Housing

a. Make provision for around 3,000 new homes (net) between 2006 and 2026.....

b. Allow for residential development if it is within the housing development boundary defined on the proposals map or if it forms an element of Policy KE2. The housing development boundary will be revised to include land within south west Keynsham.

**Representation (legal compliance):** The Core Strategy is not legally compliant as it is not in general conformity with the development plan as set out in PPS 12 paragraph 4.50 i.e. it should conform generally to the Regional Spatial Strategy. The Core Strategy is not legally compliant as it fails to make adequate provision for housing needs during the plan period. It does not conform to latest Government guidance in terms of the latest evidence base for the SW RSS or the latest DCLG 2008 based household projections. The Council's own Strategic Housing Market Assessment indicates that there is a very high housing need, both in terms of household growth and in relation to likely total future supply.

**Change sought to make legally compliant:** In order to make the Core Strategy legally compliant, the preparation of the Core Strategy should have completed a review of the Green Belt, this would be consistent with Policy SS4 of the Interim RSS and also the evidence base for latest RSS. Provision should be made to meet the latest household projections. The housing figures for the Core Strategy plan period should be increased to at least 18,500 dwellings.

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**Reference:** 285\1

**Respondent:** Aviva

**Representation** CROXLEY HOUSE

**(soundness):** Site Context

Croxley House is located in Keynsham on the A4 Keynsham bypass, on the edge of the Town Centre in close proximity to Keynsham Train Station. The site extends to approximately 1.5ha (3.7 ac) and is predominantly used for warehouse purposes. Site access is provided off Unity Road. The building is currently let to NATS (the provider of air traffic control services for the UK), but the lease is due to expire in 5 years. We enclose an illustrative site plan to identify the site.

In the Bath and North East Somerset Local Plan (adopted 2007), the site is positioned within a designated Core Business Area, where Class B2 industrial and B8 warehouse and distribution uses are encouraged and protected (Policy ET.3). However, the site is located on the edge of this employment area next to residential development and is situated within Flood Zone 1 (1:200 years low risk area), which means it is suitable for all forms of development.

In both the emerging Regional Spatial Strategy for the South West and the Core Strategy, Keynsham is identified as a significant area of growth for residential development and employment and is anticipated to undergo fundamental transformation through the regeneration of the Town Centre and redevelopment of the Cadbury Somerdale site, which is due to close in 2011.

#### Croxley House Site Specific Designation

It is our view that the Croxley House site has considerable potential to contribute to and to complement the future development of Keynsham. Whilst we acknowledge that the site is currently a protected employment site, it is also identified that the demand for industrial type uses has significantly declined over recent years and will continue to decline in the future.

The Core Strategy Economic Development and Employment Distribution Information Paper (November 2009) identifies that over the plan period to 2026, there will be a requirement for 17,000 jobs but less than 1% of this employment growth will be in the industrial sectors. In Keynsham, it is also anticipated that the majority of growth will be located within the proposed Strategic Site comprising Cadbury Somerdale which has been identified to accommodate 20,000 sq m of mixed commercial space, the Town Centre where approximately 8,000 sq m of office space may be located and the train station area. In addition, the Roger Tym and Partners and Cluttons Business Growth and Employment Land Study (March 2009) identifies that some additional 7,000 sq m of office space and 8,500 sq m of industrial floor space could be located at South West Keynsham and Broadmead Lane.

Conversely, the draft Core Strategy identifies a requirement for 11,000 dwellings and 8,700 jobs to be provided during the plan period to 2026, with development being prioritised on brownfield sites. PPS 1, 'Delivering Sustainable Communities' states in paragraph 27 that 'In preparing development plans, planning authorities should seek to.....(iv) Bring forward sufficient land of a suitable quality in appropriate locations to meet the expected needs for housing, for industrial development, for the exploitation of raw materials such as minerals, for retail and commercial development, and for leisure and recreation – taking into account issues such as accessibility and sustainable transport needs, the provision of essential infrastructure, including for sustainable waste management, and the need to avoid flood risk and other natural hazards'.

In this context, given the identified lack of demand for industrial uses and the identification of other sites to accommodate Class B uses, we consider that our client's site should be released for alternative uses and identified as a development opportunity site for either residential development or economic development uses including non Class B sector employment generating uses.

As the site is located within Flood Zone 1, it would provide suitable land for residential development and other more sensitive uses and could assist the Council to meet their demand for these uses given the lack of available land for this form of development in Keynsham. Instead, industrial uses could be located elsewhere, including on land in Flood Zone 2, which is suitable for employment uses.

Given the potential of the site and the growth which is anticipated within Keynsham, the site should be identified as a development opportunity site in the emerging Core Strategy and subsequent Site Allocations Document, in accordance with PPS12 which seeks to identify strategic development sites within the Core Strategy.

#### Conclusion

We consider that the Croxley House site should be allocated as a development opportunity site for residential development or for alternative economic uses (as defined and promoted in PPS4) and trust that our comments to the merging policies will be taken into account accordingly.

We reserve the right to supplement these representations and would be pleased to meet with officers to discuss the potential of the site in more detail.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 292\8

**Respondent:** Bath Avon River Corridor Group

**Representation** Policy KE1 p64 - A lack of understanding of the actual economic identity and synergic role

**(soundness):** Keynsham/Saltford could play within the wider economic health of the district and its urban areas and the land use hierarchies and infrastructure that will be needed to make the best of this.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 295\2

**Respondent:** Elaine Stirling

**Representation** I am completely in favour of creating more local jobs. Too many of us have to commute to bristol or

**(soundness):** bath for work.

While I agree Keynsham needs some more houses I do not think the number you are quoting to build are really needed for Keynsham people. A new site on the fry's factory site makes sense as it is near the town centre and the train station – good for transport.

Do not build large estates on the edge of Keynsham - the area by lays farm and the end of park road are too far away. These will only encourage more people to own cars and clog our roads. Keynsham high street is already bad enough.

Please keep Keynsham separate from Bath and Bristol – do let out town become part of the sprawl from either city.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 296\1

**Respondent:** Gill Stirling

**Representation** Dear Sirs

**(soundness):**

I have read your core strategy and although the ageing population is mentoned there seems to be no planning connected to this group

1) Cadbury Site :-A retirement village within easy reach of the town centre would free up many large family houses in the Keynsham area. I have 3 single elderly close to where I live in large family homes. There is nowhere near the town for them to move to and in the housing estates they become isolated during the day.

The Cadbury site would be ideal for this kind of development. However to maintain a link with the rest of the population the sporting facilities should be retained ( retired people use these as well) and also Fry Club and the large Hall. Keynsham has no large town entertainment centre with parking and this would be an ideal site where conference and entertainment could be held boosting the guest houses and hotels in Keynsham

The entrance to the Hall could double as a museum for the displaying of our Roman floor and other

finds.

The village itself should be of mixed housing including terrace 2 bed houses and bungalows with gardens and garages and also maisonettes.

These should be a mixture of owned and rented.

There should also be a residential and nursing home with a medical centre for all to use.

A small row of shops which includes grocery, newsagents, hair dressers and coffee shop.

The avenue of trees should stay as an entrance to the Cadbury Village

Behind this development there would still be room for a site of small industrial workshops.

This site would bring employment for nurses, carers, gardeners etc.

Roads:- With regards to other housing plans surely a look at the roads around Keynsham must be considered first. The high street and the A4 are already over loaded. Instead of trying to build an expensive transport link within Bath perhaps a Park and Ride on the A4 outside Keynsham would solve more of the problems.

A bus service that ran more frequently during rush hour would be helpful and the bus companies need some encouragement with this.

Some kind of semi bypass to the town could be developed from the Broadmead roundabout up to Burnett and then across to Charlton Road using then lanes already there.

Railway Station:-The Railway station still needs a ramp for the disabled and a better link with the bus services.

A cycle route across The Park to the station from the bottom of Bath Hill would make cycling more pleasant for children crossing the town.

Swimming Pool:- Keep the present Swimming Pool, which I believe was built by the people of Keynsham, and develop it further.

The area could be improved with the introduction of a downstairs entrance combining it with a restaurant on to the Park at this point. There are now good car parks at this lower level for people visiting the Pool. (This does not exist at the Wellsway site which already has car problems in Chandag Road)

If they do build their sports centre it should be approached from the Broadmead roundabout.

High Street:- Keynsham is a lovely small town with friendly residents. Please don't ruin the town centre. You plan to change the 60's buildings but do not appear to be assisting those in the threatened shops to move to the empty shops we now have in the town centre. I assume they all have leases with the council at present and will need help with cancelling these. You have chosen architects without seeing what type of building they propose for the town. I hope we get some consultation before it is chosen.

Thank you for reading this email

Yours faithfully

Gill Stirling

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 300\11

**Respondent:** Somer Housing

**Representation** Economic Development

**(soundness):** 4.1 With regard to the area based policies, we only have one recommendation which applies to all the Economic Development Policies in each area. This is that the Council inserts the policy wording as below which means that it will consider releasing lower quality employment land for affordable housing development. The quality of land should be measured against a set of criteria before it is released, but the Council should set a priority of releasing it for a significant proportion of affordable housing within the policy. Given the lack of supply of affordable housing likely to come forward over the plan period and the difficulties housing associations face competing for sites with general market housing developers without public subsidy, this could be an important source of affordable housing. 'The Council will consider releasing lower quality employment land for schemes which deliver a significant community benefit, such as the delivery of affordable housing.'

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 316\1

**Respondent:** Broadmead Lane Properties

**Representation** Broadmead Lane Properties has significant interests at Broadmead in Keynsham. They own most of the

**(soundness):** land and buildings of Broadmead Industrial Estate as well as Broadmead Lane, which provides access and egress to the Keynsham sewerage treatment plant (Wessex Water), landfill site (B&NES) and all businesses and marine interests of Broadmead Industrial Estate. There are approximately 100 people who work for a number of small to medium size enterprises (SMEs) at Broadmead Industrial Estate. This area is within the flood plain and has witnessed a number of flood events in recent history.

Although we support the overall intentions of B&NES Core Strategy Development Plan Document (DPD), we feel that there has been insufficient thought and recognition given to the role that Broadmead Lane Properties will play in flood defence of Broadmead Lane and Broadmead Industrial Estate. This is needed to secure the businesses and jobs on site and encourage investment in refurbishing the existing buildings and structures so that they are flood resilient to residual flood risk from raised defences. This would complement the flood risk management infrastructure being proposed upstream and downstream of Broadmead, ensuring it is compliant with Planning Policy Statement 25 (Development and Flood Risk) and to secure continued growth of business and jobs on site. Unfortunately, Broadmead Lane is not recognised as a 'desirable infrastructure item' in Section 3.21 on page 72 of the Core Strategy.

As a significant landowner upstream of Bristol, Somerdale and Keynsham, we feel that the Strategic Vision for Keynsham in the Core Strategy does not wholly consider the economic and resource use potential of Broadmead Industrial Estate and Broadmead Lane. Similarly, the Core Strategy does not recognise the strategic role that Broadmead Lane should play in ensuring the flood plain continues to function, but in a way that supports the continued growth of facilities and businesses at Broadmead Industrial Estate. The redevelopment of Broadmead Lane to compensate climate change flood risk will need to be aligned with the raised defences needed for Keynsham sewerage treatment plant and B&NES landfill, which is being proposed as a Materials Recovery Facility (MRF) pers comm. This will need a strategic solution between the interested parties, which should be identified in the Core Strategy rather than only including the Keynsham sewerage treatment plant and proposed MRF (see section 3.10 of the Core Strategy).

In addition to the above, we feel that insufficient consideration or annotation has been allowed in the Core Strategy to recognise the flood risk to Broadmead Lane and Broadmead Industrial Estate. Flood



Risk Management has not been sufficiently Justified by IDP Reference K1.2 of Table 6 on page 73 of the Core Strategy, which only identifies Somerdale for flood protection measures even though the B&NES Infrastructure Delivery Programme (2010) clearly states "...works on site or upstream". The Level 2 Strategic Flood Risk Assessment (SFRA) for Keynsham also suggests that without suitable flood risk management infrastructure, the flood plain at Broadmead will become more intense in depth, velocity and area in the future due to climate change.

The aforementioned is further supported by the suite of Level 2 SFRA maps and the options ranking table in the Outline Appraisal for Keynsham (Flood Risk Management Strategy 2009). The options ranking table prioritise various options for flood risk management, including 'Build new raised defences or land raising with flood resilience design to protect potential new development sites adjacent to the River Chew and River Avon', 'Building regulations (resilience)' and 'Relocation of properties'. We would like to see Broadmead Lane and Broadmead Industrial Estate identified in more detail on Diagram 12 on page 65 and referred to in Table 6 on page 73 so that they are included in future redevelopment plans and considered for relevant flood risk management infrastructure.

Finally, the Vision for Keynsham in the Core Strategy does not Justify the need for flood risk management infrastructure outlined above, which is clearly omitted from the map in Diagram 12 on page 65. Similarly, it does not Justify the potential role our land and infrastructure could play to provide medium- to high-value skills, jobs and industry which is much needed in and around Keynsham. Broadmead Industrial Estate has significant opportunity to increase capacity of jobs and businesses in the future as a result of mitigating climate change flood risk, which could further help Keynsham capitalise on this valuable resource. By including Broadmead Lane and Broadmead Industrial Estate into Diagram 12 rather than ignoring their potential, B&NES would provide for a more Effective and Sound infrastructure delivery plan. We want to ensure this is given due consideration in the Core Strategy.

By embracing Broadmead Lane and Broadmead Industrial Estate into the Core Strategy, we can play our role in enhancing Keynsham, improving the economy, future proofing our key assets, capitalising on our river location and help Keynsham to remain proud and independent. It will also provide opportunity to attract investment and jobs to Broadmead Industrial Estate and ensure that the historical buildings are sufficiently defended to conserve their importance.

**Change sought to make sound:** The following recommendations are for your further consideration, adoption or rejection in order to Justify an Effective and Sound Core Strategy:

1. Diagram 12 on page 65 should identify the connectivity of Broadmead Lane and Broadmead Industrial Estate to Keynsham.
2. Section 3.18e on page 68 should read "The proximity of the railway station to the High Street, Somerdale and River Avon."
3. Section 3.21 on page 72 should add Broadmead Lane to the list of 'desirable infrastructure items'.
4. Given the importance of Broadmead Lane to provide vehicle access to the Keynsham sewerage treatment plant, proposed MRF (B&NES landfill) and Broadmead Industrial Estate, it is recommended that an additional item is added to Table 6 on page 73 to include "Flood protection measures for Broadmead lane and Broadmead Industrial Estate." This will complement Item K1.3 Major Improvements to Sewerage capacity on page 64 of B&NES Infrastructure Delivery Programme (2010).
5. It could be argued that a holistic approach to infrastructure development and flood risk management infrastructure for Broadmead Lane and Broadmead Industrial Estate would demonstrate the delivery of 'Opportunities for integrated infrastructure provision' as suggested in Section 6.1 on page 79 of B&NES Infrastructure Delivery Programme (2010) which states "Greater coordination between highways and various infrastructure provision and maintenance to minimise disruption and reduce costs."
6. Page 2 of the Keynsham Summary Draft Core Strategy leaflet statement "No changes to the Green Belt" should be further explained in the Core Strategy to explain that some Green Belt development would be required e.g. Broadmead, as identified in the options ranking table of the Outline Appraisal for Keynsham (Flood Risk Management Strategy 2009) that included 'Rural land use change upstream of Keynsham'.
7. The Diagram on page 4 of the Keynsham Summary Draft Core Strategy leaflet should have identified

Broadmead Industrial Estate as a place for business growth.

8. Page 5 of the Keynsham Summary Draft Core Strategy leaflet should read "The role of the town centre and Somerdale as the main focus for business activity will be complemented by the Broadmead/Ashmead/Pixash Industrial Estate area." This will ensure consistency between documents.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 325\1

**Respondent:** Taylor Wimpey UK Ltd.

**Representation** THE COUNCIL'S RECOGNITION OF THE STRATEGICALLY IMPORTANT LOCATION OF  
**(soundness):** KEYNSHAM IS WELCOMED TOGETHER WITH THE COUNCIL'S ACKNOWLEDGEMENT OF KEYNSHAM'S POTENTIAL AS "A MORE SUSTAINABLE, DESIRABLE AND WELL CONNECTED PLACE IN WHICH TO LIVE AND WORK" (PAGE 14). POLICY DW1 RESPONDS TO THIS FUTURE ROLE FOR KEYNSHAM BY IDENTIFYING THE TOWN AS A FOCUS FOR NEW HOUSING, JOBS AND COMMUNITY FACILITIES. DIAGRAM 4 (PAGE 21) IDENTIFIES A HOUSING ALLOCATION FOR KEYNSHAM OF 1,500 HOMES PROPOSED THROUGH DELIVERING HOUSING ON SITES INCLUDING THE ALLOCATED LOCAL PLAN HOUSING SITE 'K2' WHICH COULD ACCOMMODATE CIRCA. 530 DWELLINGS ('SHLAA REPORT OF FINDINGS'). HOWEVER, THE 'SHLAA REPORT OF FINDINGS' (DECEMBER 2010) CHANGES THE APPROACH THE COUNCIL HAS TAKEN WITHIN THE LOCAL PLAN (POLICY GDS.1 'K2') IN RESPECT OF THE PRIMARY MEANS OF ACCESSING SITE K2B AND SUGGESTS THAT THE PRIMARY VEHICULAR ACCESS TO THIS SITE SHOULD BE FROM CHARLTON ROAD ACROSS ABBOTS WOOD (GREEN BELT LAND) AND NOT FROM PARK ROAD AS IDENTIFIED WITHIN THE LOCAL PLAN. THIS NEW ACCESS ARRANGEMENT DOES NOT APPEAR TO BE SUPPORTED BY ANY Bath and North East Somerset's Core Strategy – Publication Stage Representation Form HIGHWAY EVIDENCE WITHIN THE SHLAA TO DEMONSTRATE THAT THE ACCESS IS DELIVERABLE AND JUSTIFIED FOR SITE K2B OR WILL BE ABLE TO DELIVER CIRCA. 530 DWELLINGS ON SITE K2. CONVERSELY THE COUNCIL'S HIGHWAYS OFFICER RAISED NO OBJECTION TO THE MEANS OF ACCESSING SITE K2B FROM PARK ROAD AT THE LOCAL PLAN INQUIRY OR IN RESPECT OF PLANNING APPLICATION 09/04351/FUL.. (REFER TO THE SEPARATE NOTE ON THE 'SHLAA – REPORT OF FINDINGS APPENDIX 1C – KEYSNHAM SITE ASSESSMENTS – DECEMBER 2010)

**Change sought to** THERE IS NO JUSTIFICATION FOR CHANGING THE MEANS OF ACCESS TO SITE K2B FROM  
**make sound:** THAT IDENTIFIED WITHIN THE LOCAL PLAN POLICY (POLICY GDS.1 K2) WHERE ACCESS IS SHOWN FROM PARK ROAD. ACCESS TO SITE K2B SHOULD REVERT TO THAT IDENTIFIED IN THE LOCAL PLAN AND SHOULD NOT BE TAKEN FROM CHARLTON ROAD.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 325\2

**Respondent:** Taylor Wimpey UK Ltd.

**Representation** POLICY KE1 HIGHLIGHTS THE NEED TO "MAINTAIN THE GREEN BELT SURROUNDING KEYNSHAM"  
**(soundness):** (POINT 1b) WHILST ALSO DELIVERING AROUND 1,500 HOMES IN KEYNSHAM. HOWEVER, THE 'SHLAA REPORT OF FINDINGS' (DECEMBER 2010) FOR SITE K2 'SOUTH WEST KEYNSHAM' IDENTIFIES THAT THE PRIMARY MEANS OF ACCESS TO SITE K2B SHOULD "BE FROM CHARLTON ROAD WITH ROUTE CROSSING INTERVENING WOODLAND TRUST LAND". THE WOODLAND TRUST LAND IS GREEN BELT LAND AND THEREFORE ACCESSING SITE K2B ACROSS GREEN BELT LAND WOULD BE CONTRARY TO THE GUIDANCE CONTAINED WITHIN POLICY KE1 AND TO NATIONAL PLANNING POLICY GUIDANCE RELATING TO THE PROTECTION OF GREEN BELT LAND FROM INAPPROPRIATE DEVELOPMENT UNLESS EXCEPTIONAL CIRCUMSTANCES EXIST.

THERE APPEARS TO BE NO HIGHWAY JUSTIFICATION TO SUPPORT THE COUNCIL'S IDENTIFICATION OF THE PRINCIPAL MEANS OF ACCESS TO SITE K2B BEING FROM CHARLTON ROAD AS OPPOSED TO THE

LOCAL PLAN'S IDENTIFIED MEANS OF ACCESS TO SITE K2B BEING FROM PARK ROAD. ACCESS FROM PARK ROAD DOES NOT COMPROMISE THE INTEGRITY OF KEYNSHAM'S GREEN BELT.

THE DELIVERY OF HOUSING ON SITE K2B (WHICH FORMS PART OF KEYNSHAM'S HOUSING Bath and North East Somerset's Core Strategy – Publication Stage Representation Form CONTRIBUTION BETWEEN 2006-2026) MAY BE COMPROMISED BY THE COUNCIL'S CHANGE OF APPROACH TOWARDS ACCESSING THE SITE ACROSS GREEN BELT LAND AND THE OWNERSHIP OF THIS LAND BY THE WOODLAND TRUST. THE COUNCIL HAS PROVIDED NO MASTERPLAN EVIDENCE TO SHOW THAT AN ACCEPTABLE SITE LAYOUT AND SATISFACTORY HOUSING NUMBERS CAN BE ACHIEVED ON SITE K2B WHERE THE PRIMARY ACCESS FROM CHARLTON ROAD.

(REFER TO THE SEPARATE NOTE ON THE 'SHLAA – REPORT OF FINDINGS APPENDIX 1C – KEYNSHAM SITE ASSESSMENTS – DECEMBER 2010)

**Change sought to make sound:** NO JUSTIFICATION IS PROVIDED FOR CHANGING THE MEANS OF ACCESS TO SITE K2B FROM PARK ROAD TO CHARLTON ROAD, THE LATTER WHICH WILL RESULT IN DEVELOPMENT WITHIN THE GREEN BELT.

MEANS OF ACCESS TO SITE K2B SHOULD REVERT TO THAT STATED WITHIN POLICY GDS.1

K2 OF THE ADOPTED LOCAL PLAN WHEREBY ACCESS TO THE SITE FROM PARK ROAD WAS CONSIDERED ACCEPTABLE BY THE LOCAL PLAN INSPECTOR. FURTHERMORE, NO OBJECTION WAS RAISED BY THE COUNCIL'S HIGHWAYS OFFICER TO ACCESSING SITE K2B FROM PARK ROAD IN RESPECT OF PLANNING APPLICATION 09/04351/FUL.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 3.17**

**Reference:** 239\11 S

**Respondent:** Keynsham Civic Society

**Representation (soundness):** 3.17 Support these changes, especially when 'inspired by its character and heritage'.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 3.18**

**Reference:** 239\12

**Respondent:** Keynsham Civic Society

**Representation (soundness):** The statement that there are 'few vacancies' is out of date.

h. Keynsham does not give direct access to national motorway network should this refer to National Rail networks?

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 3.19**

**Reference:** 239\13

**Respondent:** Keynsham Civic Society

**Representation** a. Strongly endorse the statement from English Heritage.

**(soundness):** d. Question the validity of the statement that "There is a notable lack of 'evening economy' uses.

f. Strongly endorse this statement with respect to Keynsham High Street.

g. Question the statement that there are poor connections to Ashton Way car park from the High Street.

h. Strongly agree that the Centre and Riverside offices are unattractive.

i. The A4 and the railway line form a partial barrier to pedestrian and cycling movement between the Town Centre and Somerdale. This statement is misleading and invalid as access is freely available via Station Road and Avon Mill Lane, as well as pedestrian access through the Park.

j. Agree that car parking capacity serving the town centre is limited, but do not want to increase car usage within the town; prefer encouraging the use of walking, cycling and public transport. To this end a local frequent circulating bus service would be beneficial.

n. Question the statement that 'rail services are limited between Bristol and Bath', as they are approximately every 30 minutes during the day. The return evening connections do need to be addressed as services are reduced hourly after 6pm.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Policy KE2: Keynsham Town Centre/Somerdale Strategic Policy**

**Reference:** 42\1 S

**Respondent:** Bitton Parish Council

**Representation** Take into account the need to retain Keynsham Town Centre as a vibrant and commercially viable

**(soundness):** shopping area serving the needs of all residents in many ways

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 96\4 S

**Respondent:** Keynsham Town Council

**Representation** •The Town Centre/Somerdale – must be joined up and integrated with each other. Somerdale should

**(soundness):** not become an area/place in its own right. Larger industrial units are a must as mentioned in the Core Strategy as Keynsham presently only has smaller ones to offer.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 96\5

**Respondent:** Keynsham Town Council

**Representation** The Town Council feels very strongly that TPO's should be put on the trees on the driveway to the

**(soundness):**

Somerdale site and that this should happen as soon as possible.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 96\6 S

**Respondent:** Keynsham Town Council

**Representation** The Town Council approved of retaining leisure centre facilities in the Town Centre as it is felt that this  
**(soundness):** is very important.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 96\7 S

**Respondent:** Keynsham Town Council

**Representation** The Green infrastructure link – excellent.  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 96\8 S

**Respondent:** Keynsham Town Council

**Representation** The Town Council asks can there please be a strong emphasis on the management of transport /traffic  
**(soundness):** through the Town Centre – residents feel strongly about this.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 96\9

**Respondent:** Keynsham Town Council

**Representation** The Town Council has some concerns over district heating however this could be due to a lack of  
**(soundness):** knowledge.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 96\10

**Respondent:** Keynsham Town Council

**Representation** A site has been identified for waste – the Town Council thought that this had been removed?  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 96\11 S

**Respondent:** Keynsham Town Council

**Representation** The Keynsham Town Council Planning Committee reviewed the Replaced Local Plan Policies and  
**(soundness):** confirms that the replaced policies are fine.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 114\1

**Respondent:** Society of Merchant Venturers c/o Carter Jonas LLP

**Representation** We consider that Policy KE2 does not include sufficient flexibility should brownfield sites within the  
**(soundness):** urban area, including the Somerdal Factory site, not be deliverable. The policy is therefore inadequate and may prove to be ineffective.

In the current economic climate, the viability of developing a former factory site may be called into question due to potential contamination and the mitigation that may be required to ensure the site is developable. The Council is relying heavily on this site to deliver the amount of housing required in Keynsham.

We therefore consider that the Council should allocate a reserve site on greenfield land adjacent to the built up area that could be delivered quickly. Such a site could then be developed if land supply monitoring showed that the Council was unable to demonstrate a five-year supply in accordance with Planning Policy Statement (PPS) 3: Housing.

As previously stated, land to the south of Keynsham, to the east of Wellsway, is immediately deliverable as it is a greenfield site in a single ownership. This site would be an appropriate reserve site should the Somerdale Factory site not come forward for development.

**Change sought to** We propose the following wording be added to Policy KE2:  
**make sound:**

"In the event that the Council is unable to demonstrate a five-year supply of housing land in accordance with PPS2, the Council will seek development on land south of Keynsham, east of Wellsway, to meet the shortfall."

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 131\1 S

**Respondent:** Mr G. Fear

**Representation** Any new development in and around the centre of the town must be suitable to reinstate the character  
**(soundness):** and heritage of the town which has been sadly lost since the 1960's. The road infrastructure improvements should be carried out to enable the High Street to be safely used and free from traffic with improved air quality. Market traders' space can be provided to the widened High Street where the round- about is presently situated.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 239\14

**Respondent:** Keynsham Civic Society

**Representation** 2d The important word is complement.

**(soundness):** 3a & f Agree in principle, but these statements should more specifically address the 'at risk' issues raised by EH in 3.19.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 252\4 S

**Respondent:** Cadbury Kraft Foods

**Representation** We fully support and endorse the identification of Somerdale as part of a strategic development site

**(soundness):** within Policy KE1 and KE2. This emerging policy reflects the significant potential of Somerdale as a major development site within the District, which will provide new employment and houses as part of a new, distinctive high quality neighbourhood and will contribute to the future of Keynsham. However, we also make the following points:

1. The strategic site can potentially accommodate further development. The Somerdale Vision identifies that the site can accommodate approximately 600 dwellings and 20,000 sq m of commercial space. The capacity put forward for the strategic site of 700 units should therefore take account of the level of development which can be accommodated on Somerdale and any other sites which will be coming forward in the area over the Plan period.
2. We acknowledge the desire to provide a District Heating Network within Keynsham, with potential at Somerdale and the town centre. However, actual proposals for sustainable energy measures on the site will need to be fully explored as part of the future development proposals for the site.
3. With regard to consideration being given to the potential for converting and reusing some or all of the factory buildings at Somerdale, this approach is consistent with the development principles within the Vision. The Vision identifies that consideration will be given to the retention of buildings and assets where viable and capable of making a positive contribution.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 295\3 S

**Respondent:** Elaine Stirling

**Representation** Keynsham needs help to thrive. I agree with the idea of replacing the town hall and the shops on the

**(soundness):** same piece of land – peacocks etc.. But only if you replace those retail units with new units.

We have already lost the handy man from Keynsham which is a huge loss – please don't let us lose any more.

The current site is truly ugly and really lets the town down. Please don't let anything so ugly be inflicted on our town again.

A new site on the fry's factory site makes sense as it is near the town centre and the train station – good for transport.

If you are going to insist on such a large number of new houses and people moving into Keynsham for goodness sake do not take away the good things in the town – namely the leisure centre for one. I have been informed that this is definitely going to close. – this is just ridiculous. DO NOT destroy such a good

facility. I know the idea has been muted of a dual site facility at Wellsway but I believe that these do not work as well as the are always intended with the schools gaining the most and the general public losing out. – and if its on the wellsway side of town that is further away for the rest of us to get too... encouraging yet more driving! I'm happy with a 15 minute walk – but a 40 minute walk is a long way especially in winter and in the dark.

I am also worried about the loss of sport facilities if the fry site is overdeveloped. Do not take away all that is good with the town.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 297\10

**Respondent:** Bath Rugby Club

**Representation** Page 71, Policy KE2, Town Centre/Somerdale Strategic Policy

**(soundness):**

Under sub-heading 2 (scope and scale of change) we consider clause (b) could be improved by recognising the importance of sports in a mixed-use development as part of a town offer. We therefore consider that "sports" should be inserted after "leisure" in 2 (b)

We also consider for the same reasons that 3 (g) could be improved by inserting "sports" after "leisure"

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 325\3

**Respondent:** Taylor Wimpey UK Ltd.

**Representation** DELIVERY OF THE DEVELOPMENT PROPOSALS COMPRISING THE TOWN CENTRE / SOMERDALE

**(soundness):** STRATEGIC SITE, IN PARTICULAR THE PROVISION OF UP TO 700 DWELLINGS, IS RELIANT UPON THE IMPLEMENTATION OF SIGNIFICANT HIGHWAY, FLOOD PROTECTION AND SEWERAGE INFRASTRUCTURE WORKS AS WELL AS EXTENSIVE TRAFFIC MANAGEMENT IMPROVEMENTS WITHIN THE TOWN CENTRE IN ORDER TO ENSURE THAT SUCH AN INTENSIVE FORM OF DEVELOPMENT DOES NOT ADVERSELY AFFECT THE FUNCTIONING AND CHARACTER OF THE TOWN.

IT IS CONSIDERED THAT, BEFORE TAKING FORWARD THIS STRATEGIC SITE, FURTHER INVESTIGATIONS ARE REQUIRED RELATING TO THE EXTENSIVE INFRASTRUCTURE REQUIREMENTS ASSOCIATED WITH BRINGING FORWARD THIS ALLOCATION, MANY ELEMENTS OF WHICH (SEWERAGE CAPACITY, FLOOD PROTECTION, HIGHWAY INFRASTRUCTURE) WILL NEED TO BE DELIVERED IN ADVANCE OF ANY DEVELOPMENT.

THESE INVESTIGATIONS WILL ENSURE THAT THE PROPOSALS FOR DEVELOPMENT AT THIS LOCATION, IN PARTICULAR THE PROVISION OF UP TO 700 DWELLINGS, AS WELL AS THE PHYSICAL AND SOCIAL INFRASTRUCTURE, ARE DELIVERABLE.

**Change sought to** FURTHER TECHNICAL STUDIES ARE REQUIRED REGARDING FLOOD MITIGATION, SEWERAGE CAPACITY,  
**make sound:** HIGHWAY INFRASTRUCTURE AND TRAFFIC MANAGEMENT REQUIREMENTS ASSOCIATED WITH IMPLEMENTING THIS STRATEGIC SITE TO DEMONSTRATE THAT DEVELOPMENT CAN OVERCOME ITS CONSTRAINTS AND IS CAPABLE OF DELIVERY WITHIN THE NEXT 15 YEARS.

**Representation (legal compliance):**

**Change sought to make legally compliant:**



**Plan Reference: Paragraph 3.20**

**Reference:** 239\15

**Respondent:** Keynsham Civic Society

**Representation** Pedestrian/cycling bridge over A4. The railway station is immediately adjacent to Abbey Park, which  
**(soundness):** leads to the park. Any bridge across the A4 will need to accommodate the steep slopes either side and must not blot the park landscape for park users, must protect the Abbey ruins and not impinge on residents of Abbey Close.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 3.21**

**Reference:** 239\16 S

**Respondent:** Keynsham Civic Society

**Representation** Agree that the town centre highway network needs redesigning and this should include consideration  
**(soundness):** of improving the pedestrian access in the High Street.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 3.25**

**Reference:** 239\17

**Respondent:** Keynsham Civic Society

**Representation** Suggest an extension of free parking in the existing car parks to help local businesses.  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Table 6: Summary of Key Infrastructure in Keynsham**

**Reference:** 42\2 S

**Respondent:** Bitton Parish Council

**Representation** The continued need to ensure that Keynsham Station meets and serves the needs of all local residents  
**(soundness):**

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 295\4

**Respondent:** Elaine Stirling

**Representation** There needs to be a much better link between bus' and trains. The train station needs a complete **(soundness):** overhaul.

I had an operation on my foot and have not been able to get a train because of the long flight of stairs – the result is having to use the bus which costs twice as much. Its not fair that disability (however temporary or permanent) means that you have to suffer financially because of poor facilities.

**Change sought to  
make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

#### Plan Reference: Diagram 14: Somer Valley Location

**Reference:** 246\18

**Respondent:** Combe Hay Parish Council

**Representation** It is not correct to show the built-up extent of the City Of Bath as including the area along the A367 **(soundness):** beyond the boundary of the City.

**Change sought to  
make sound:** Delete the extensions showing the built-up City of Bath along the A367.

**Representation (legal compliance):**

**Change sought to make legally compliant:**